EXHIBIT INDEX

Hawk et al. v. Salvador Catrain Calderon

Supreme Court of the State of New York - County of New York

Exhibit A: Complaint Filed by Salvador Catrain in Miami-Dade County (Aug 18, 2024)

Includes the notarized promissory note dated June 11, 2021.

Exhibit B: Official Dominican Migratory Records (Apostilled)

Proves plaintiffs were not present in the DR on June 11, 2021.

Exhibit C: Amended Verified Complaint Filed by Catrain (Sept 26, 2024)

Shows date manipulation from 'June 11' to 'June 2021' after fraud was raised.

Exhibit D: Forensic Handwriting Report - Patricia J. Hale

Expert concludes the witness signature on the promissory note was not authored by the named witness.

Exhibit E: Order of Dismissal With Prejudice (March 27, 2025)

U.S. District Court for the Southern District of Florida - Catrain's case withdrawn and dismissed.

EXHIBIT A

Filing # 204959090 E-Filed 08/18/2024 05:08:32 PM

IN THE CIRCUIT COURT OF THE 11th JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CIRCUIT CIVIL DIVISION

CASE NO.

CATRAIN BUSINESS MANAGEMENT, S.L.R.,

Plaintiff,

vs.

WILLIAM MATTHEW HAWK, and JOSE DALBY CONTRERAS REYES,

Defendants.

_____/

Complaint

Plaintiff, Catrain Business Management, S.L.R. ("Plaintiff"), hereby sues and files this Complaint for Breach of Promissory Note, against Defendants William Matthew Hawk and Jose Dalby Contreras Reyes (collectively "Defendants"), and alleges as follows:

1. Plaintiff is a company in the Dominican Republic.

2. Defendants reside in, conduct business in, and/or own real property in Miami-Dade County, Florida.

3. In June 2021, the Parties entered into a Promissory Note ("Note") [**Ex. 1**].[1]

4. Per the terms of the Note, the Defendants are debtors and personally liable to Plaintiff in the amount of $295,000.

5. Per the terms of the Note, Defendants agreed to pay Plaintiff monthly payments composed of principal and 8% fixed annual interest for 48 months for $8,112.50 per month.

[1] The Note is in Spanish, so attached is the Spanish version and the certified English version.

6. Per the terms of the Note, the 48 monthly payments were to be paid between July 17, 2021 – June 17, 2025.

7. Per the terms of the Note, the Defendants "commit[ted their own assets," [] "and that if the payment obligations were not complied with on each of the dates and conditions indicated, both for the payment of interest and principal, and for the simple failure to pay any of the installments, [Defendants] shall lose the benefit of the established term as of right becoming immediately due the total amount owed in interest capital, legal expenses, and other accessory expenses, without any previous judicial or extrajudicial formality and without the need of default."

8. Per the terms of the Note, "the parties acknowledge that the present notarial promissory note has the enforceable force of a judgment."

9. In accordance with the terms of the Note, Defendants paid Plaintiff 25 payments, between July 2021 – September 2023, for a total of $153,645.75.

10. September 2023 was the last payment that Defendants made to Plaintiff.

11. As such, Defendants have failed to make any additional payments since September 2023 and are therefore in default and breach of the Note for the remaining principal amount of $141,354.25, plus interest in the amount of $23,600.04, plus any additional pre-judgment and/or post-judgment interest that may be allowable under Florida law.

12. The amount in controversy greatly exceeds the $50,000 threshold to file this action in this Miami-Dade County, Florida Circuit Court.

13. Jurisdiction and Venue are proper in Miami-Dade County, Florida.

14. Any conditions necessary to the bringing of this action (if any) have been performed, occurred or have been waived.

15. Plaintiff has agreed to pay the undersigned law firm reasonable attorney's fees.

Count I – Breach of Promissory Note[2]

16. Plaintiff adopts and incorporates Paragraphs 1-15 as if set forth herein.

17. In June 2021, Defendants executed and delivered a Note **[Ex. 1]**, to Plaintiff.

18. Plaintiff owns and holds the Note.

19. Since October 2023, Defendants have failed to pay any of the installment payments due on the Note, and Plaintiff elects to accelerate payment of the balance due.

20. Defendants owe Plaintiff the remaining principal amount of the Note of $141,354.25, plus interest in the amount of $23,600.04, plus any additional pre-judgment interest since October 2023 and/or post-judgment interest that may be allowable under Florida law.

21. Plaintiff is obligated to pay its undersigned counsel a reasonable attorney fee for his legal services.

WHEREFORE, Plaintiff demands judgment for monetary damages against Defendants, plus interest, and further demands attorney's fees per the terms of the Note, and taxable costs.

Dated: August 18, 2024

Respectfully submitted,

RUSSOMANNO & BORRELLO, P.A.
Attorneys for Plaintiff Catrain Business Management, S.L.R.
Museum Tower – Penthouse 2800
150 West Flagler Street
Miami, Florida 33130
Telephone: (305) 373-2101
Facsimile: (305) 373-2103

By: /s/ Herman J. Russomanno III
Herman J. Russomanno III
Fla. Bar No. 21249
herman2@russomanno.com

[2] Plead in conformity with Form 1.934 [Promissory Note] of Florida Rules of Civil Procedure.

EXHIBIT 1

PAULETTE LUCÍA RICART OBJÍO
Legal Interpreter

The undersigned, PAULETTE LUCÍA RICART OBJÍO, Legal Interpreter of the Dominican Republic, appointed to legally exercise my duties, CERTIFY that I have loyally translated a document written in the SPANISH language, which version in ENGLISH, according to the best of my knowledge reads as follows:

[Page 1]

[National Coat of Arms of the Dominican Republic]
Dominican Republic
MINISTRY OF FOREIGN AFFAIRS
Viceministry of Consular and Immigration Matters
Document Legalization Direction

APOSTILLE
(Convention de la Haye du 5 octobre 1961)

1. **Country:** DOMINICAN REPUBLIC

This public document

2. **Has been signed by:** MASSIEL TAVERAS HERNANDEZ
3. **Acting in the capacity of:** AUTHORIZED SIGNATURE
4. **Bears the seal/stamp of:** OFFICE OF THE ATTORNEY GENERAL

Certified

5. **At:** SANTO DOMINGO
6. **On the:** 11/20/2023
7. **By:** OPINIO ANTONIO DIAZ VARGAS - VICE-MINISTER OF CONSULAR AND IMMIGRATION MATTERS
8. **Under the No.** AP-2023-11-20-801
9. **Seal / Stamp:** [Seal]
10. **Signature:** [Illegible Signature]

Verification			
Country of Destination:	UNITED STATES OF AMERICA	**Verification Code:**	XKGHJ5U3A8YRP4
This Apostille only certifies the authenticity of the signature and the capacity of the person who has signed the public document and, where appropriate, the identity of the seal or stamp which the public document bears.		[QR Code]	

[Page 2 and 3]

NOTARIAL CERTIFICATION.-

I, LICDA. MAGALY CALDERÓN GARCÍA, Notary Public of the Number of the National District, CERTIFY AND WITNESS that, in my protocol books, there is an act passed before me, which transcribed in its entirety reads as follows: NOTARIAL PROMISSORY NOTE. ACT NUMBER ONE HUNDRED AND FORTY EIGHT (148).- In the City of Santo Domingo, National District, Capital of the Dominican Republic, on the eleventh (11th) day of June of the year two

thousand and twenty one (2021), before me, **LICDA. MAGALY CALDERÓN GARCÍA**, Dominican, of legal age, single, attorney at law, Notary Public of the Number of the National District, Collegiate No. thirteen eighty nine (1389), holder of the identity and electoral card N[redacted] with professional office open at Pasteur Street No. two five six (256), Hidalgo Building one (I), apt. three zero one (301), Gazcue Sector, National District, Dominican Republic, have appeared, freely and voluntarily, as **JOINT AND SOLIDARITY DEBTORS**, Mr. **WILLIAM MATTHEW HAWK**, American citizen, of legal age, single, identified by American passport [redacted], residing at Rafael Hernandez Street, Torre Montecruz, Apartment three (3) A, Naco, City of Santo Domingo, National District, Capital of the Dominican Republic; **JOSÉ DALBY CONTRERAS REYES**, Dominican, of legal age, single, bearer of identity and electoral card number [redacted] with domicile in Sarasota Avenue number twenty (20), Torre Empresarial AIRD Building, Apartment four (4) Northwest, La Julia, City of Santo Domingo, National District, capital of the Dominican Republic, who appear personally and, once they are before me, have declared freely and voluntarily the following: **FIRST:** That they **ACKNOWLEDGE AND DECLARE TO BE JOINT AND SOLIDARY DEBTORS** of the company **CATRAIN BUSINESS MANAGEMENT, S.R.L.**, constituted in accordance with the Dominican laws with RNC number one dash one three one two seven nine six zero dash two (1-3127960-2), social domicile established in Sarasota Avenue number twenty (20), Torre Empresarial AIRD Building, Apartment four dash (4-) Northwest, La Julia, of this city of Santo Domingo, National District, Capital of the Dominican Republic, duly represented by LIC. SALVADOR CATRAIN CALDERON, Dominican, of legal age, married, lawyer by profession, holder of identity and voter's card numbe[redacted], of this domicile and residence; for the amount of **TWO HUNDRED AND NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS AND 00/100 (US$295,000. 00)**, for concept of personal loan acquired and received on this same date, and by means of this authentic document; **SECOND:** That the parties hereto **BIND AND COMMIT** themselves to pay the amounts owed in monthly payments composed of principal and eight percent (8%) fixed annual interest, in the following manner: forty-eight (48) monthly, fatal and consecutive installments of **EIGHT THOUSAND ONE HUNDRED AND TWELVE DOLLARS AND 50/100 DOLLAR CENTS (US$8,112.50)** beginning on the seventeenth (17th) day of July of the year two thousand twenty-one (2021), and ending on the seventeenth (17th) day of June of the year two thousand twenty-five (2025); **THIRD:** That in order to strengthen the guarantees of the aforementioned debt, the parties hereto **DECLARE TO COMMIT** the universality of their own assets and rights, present and future until the total and definitive payment of the amount owed; and that if the payment obligation is not complied with on each of the dates and conditions indicated, both for the payment of interest and principal, and for the simple failure to pay any of the installments, they shall lose the benefit of the established term as of right, becoming immediately due the total amount owed in interest, capital, legal expenses, and other accessory expenses, without any previous judicial or extrajudicial formality and without the need of default; **FOURTH:** That the parties acknowledge that the present notarial promissory note has the enforceable force of a judgment by virtue of what is established in **ARTICLE 545 OF THE CODE OF CIVIL PROCEDURE**. Done and passed in my office on the date indicated above and read in its entirety to the undersigned, as well as to the instrumental witnesses present, Mrs. **JENNY HORTENCIA MENA DÍAZ** and **EDUARD BAUTISTA**, both Dominicans, of legal age, holders of identity and voter identification card [redacted] respectively, domiciled and residing in the City of Santo Domingo de Guzmán, National District, Capital of the Dominican Republic; who after hearing it in sign of approval, sign it before me and together with me, Notary Public that I certify and attest, also writing the undersigned, Mr. **WILLIAM MATTHEW HAWK** and Mr. **JOSÉ DALBY CONTRERAS REYES**, in their own handwriting the following. **"GOOD AND VALID FOR THE SUM OF TWO HUNDRED NINETY FIVE THOUSAND UNITED STATES DOLLARS AND 00/100 (US$295,000.00)"**. Space to write **"GOOD AND VALID FOR THE AMOUNT OF TWO HUNDRED NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS WITH 00/100 (US$295,000.00)"**. **That I certify and attest.**- Signed, **WILLIAM MATTHEW HAWK**, (Declarant), and **JOSÉ DALBY CONTRERAS REYES**, (Declarant), **JENNY HORTENCIA MENA DÍAZ**, (Witness), and **EDUARD BAUTISTA**, (Witness), **LICDA. MAGALY CALDERÓN GARCÍA**, (Notary Public). Registered in Santo Domingo, National District, capital of the Dominican Republic, on the twenty-ninth (29th) day of September of the year two thousand twenty-two (2022), Letter DG-AC, Registration No. 2022-52503, registered in the address of the Civil Registry and Conservancy of Mortgages. Issued the **FIRST** true and correct copy of the original, at the request of the interested party. In the city of Santo Domingo, National District, capital of the Dominican Republic, on the twenty-ninth (29th) day of September of the year two thousand and twenty-two (2022).

[Illegible Signature and Seal]
LICDA. MAGALY CALDERON GARCIA
Notary Public
Collegiate No. 1389.-

[Seal of the Office of the Attorney General]

NOTARY PUBLIC [Seal]

PROMISSORY NOTE

ACT NUMBER ONE HUNDRED AND FORTY EIGHT (148).- In the City of Santo Domingo, National District, Capital of the Dominican Republic, on the eleventh (11th) day of June of the year two thousand and twenty one (2021), before me, **LICDA. MAGALY CALDERÓN GARCÍA**, Dominican, of legal age, single, attorney at law, Notary Public of the Number of the National District, Collegiate No. thirteen eighty nine (1389), holder of the identity and electoral car[redacted] with professional office open at Pasteur Street No. two five six (256), Hidalgo Building one (I), apt. three zero one (301), Gazcue Sector, National District, Dominican Republic, have appeared, freely and voluntarily, as **JOINT AND SOLIDARITY DEBTORS**, Mr. **WILLIAM MATTHEW HAWK**, American citizen, of legal age, single, identified by American passport numb[redacted] residing at Rafael Hernandez Street, Torre Montecruz, Apartment three (3) A, Naco, City of Santo Domingo, National District, Capital of the Dominican Republic; **JOSE DALBY CONTRERAS REYES**, Dominican, of legal age, single, bearer of identity and electoral card numbe[redacted], with domicile in Sarasota Avenue number twenty (20), Torre Empresarial AIRD Building, Apartment four (4) Northwest, La Julia, City of Santo Domingo, National District, capital of the Dominican Republic, who ,appear personally and, once they are before me, have declared freely and voluntarily the following: **FIRST:** That they **ACKNOWLEDGE AND DECLARE TO BE JOINT AND SOLIDARY DEBTORS** of the company **CATRAIN BUSINESS MANAGEMENT, S.R.L.**, constituted in accordance with the Dominican laws with RNC number one dash one three one two seven nine six zero dash two (1-3127960-2), social domicile established in Sarasota Avenue number twenty (20), Torre Empresarial AIRD Building, Apartment four dash (4-) Northwest, La Julia, of this city of Santo Domingo, National District, Capital of the Dominican Republic, duly represented by LIC. SALVADOR CATRAIN CALDERON, Dominican, of legal age, married, lawyer by profession, holder of identity and voter's card number zero zero one zero dash zero six zero six two five five five four dash zero (001¬0062554-0), of this domicile and residence; for the amount of **TWO HUNDRED AND NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS AND 00/100 (US$295,000. 00)**, for concept of personal loan acquired and received on this same date, and by means of this authentic document; **SECOND:** That the parties hereto **BIND AND COMMIT** themselves to pay the amounts owed in monthly payments composed of principal and eight percent (8%) fixed annual interest, in the following manner: forty-eight (48) monthly, fatal and consecutive installments of **EIGHT THOUSAND ONE HUNDRED AND TWELVE DOLLARS AND 50/100 DOLLAR CENTS (US$8,112.50)** beginning on the seventeenth (17th) day of July of the year two thousand twenty-one (2021), and ending on the seventeenth (17th) day of June of the year two thousand twenty-five (2025); **THIRD:** That in order to strengthen the guarantees of the aforementioned debt, the parties hereto **DECLARE TO COMMIT** the universality of their own assets and rights, present and future until the total and definitive payment of the amount owed; and that if the payment obligation is not complied with on each of the dates and conditions indicated, both for the payment of interest and principal, and for the simple failure to pay any of the installments, they shall lose the benefit of the established term as of right, becoming immediately due the total amount owed in interest, capital, legal expenses, and other accessory expenses, without any previous judicial or extrajudicial formality and without the need of default; **FOURTH:** That the parties acknowledge that the present notarial promissory note has the enforceable force of a judgment by virtue of what is established in **ARTICLE 545 OF THE CODE OF CIVIL PROCEDURE**. Done and passed in my office on the date indicated above and read in its entirety to the undersigned, as well as to the instrumental witnesses present, Mrs. **JENNY HORTENCIA MENA DÍAZ** and **EDUARD BAUTISTA**, both Dominicans, of legal age, holders of identity and voter identification card numbers four, zero, two, dash, two, zero, six, one, one, seven, three, dash, one (402-2061173-1) and zero, zero, one, dash, one, seven, seven, six, zero, zero, zero, eight, dash, two (001-1776008-2) respectively, domiciled and residing in the City of Santo Domingo de Guzmán, National District, Capital of the Dominican Republic; who after hearing it in sign of approval, sign it before me and together with me, Notary Public that I certify and attest, also writing the undersigned, Mr. **WILLIAM MATTHEW HAWK** and Mr. **JOSÉ DALBY CONTRERAS REYES**, in their own handwriting the following. **"GOOD AND VALID FOR THE SUM OF TWO HUNDRED NINETY FIVE THOUSAND UNITED STATES DOLLARS AND 00/100 (US$295,000.00)".**

Space to write "GOOD AND VALID FOR THE AMOUNT OF TWO HUNDRED NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS WITH 00/100 (US$295,000.00)".

[Handwritten]
1.- GOOD AND VALID FOR THE AMOUNT OF TWO HUNDRED NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS WITH 00/100 (US$295,000.00).

2.- GOOD AND VALID FOR THE AMOUNT OF TWO HUNDRED NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS WITH 00/100 (US$295,000.00).

[Illegible Signature]
WILLIAM MATTHEW HAWK
DECLARANT DEBTOR

[Illegible Signature]
JOSE DALBY CONTRERAS REYES
DECLARANT DEBTOR

[Illegible Signature]
JENNY HORTENCIA MENA
WITNESS.-

[Illegible Signature]
EDUARD BAUTISTA
WITNESS.-

[Illegible Signature and Seal]
LICDA. MAGALY CALDERON GARCIA
NOTARY PUBLIC

[Seal of the Mayor's Office]

IN FAITH OF WHICH, I sign and seal this translation, that is faithful according to the original document, issued by request of the interested party, in the city of Santo Domingo, National District, capital of the Dominican Republic, today, on the twenty-fourth (24th) day of the month of July of the year two thousand twenty-four (2024).

República Dominicana
MINISTERIO DE RELACIONES EXTERIORES
Viceministerio para Asuntos Consulares y Migratorios
Dirección de Legalización de Documentos

APOSTILLA

(Convention de la Haye du 5 octobre 1961)

1.País:
Country / Pays — REPÚBLICA DOMINICANA

El presente documento público
This public document / Le présent acte public

2.Ha sido firmado por:
Has been signed by / A été signé par — MASSIEL TAVERAS HERNANDEZ

3.Quien actúa en calidad de:
Acting in the capacity of / Agissant en qualité de — FIRMA AUTORIZADA

4.Y está revestido del sello / timbre de:
Bears the seal / stamp of
Est revêtu du sceau / timbre de — PROCURADURIA GENERAL DE LA REPUBLICA

Certificado
Certified / Attesté

5.En: At / Á	SANTO DOMINGO	6.El día: The / Le	20/11/2023
7.Por: By / Par	OPINIO ANTONIO DIAZ VARGAS - VICEMINISTRO ASUNTOS CONSULARES Y MIGRATORIOS	8.Bajo el número: N° / Sous°	AP-2023-11-20-801
9.Sello / Timbre: Seal / Stamp Sceau / Timbre		10.Firma: Signature	

Verificación
Verification / Vérification

País Destino:	ESTADOS UNIDOS DE AMÉRICA	**Código de verificación:**	XKGHJ5U3A8YR5P4

Esta **Apostilla** certifica únicamente la autenticidad de la firma, la calidad en que el signatario del documento haya actuado, y en su caso, la identidad del sello o timbre del que el documento público este revestido.

This **Apostille** only certifies the authenticity of the signature and the capacity of the person who has signed the public document, and, where appropriate, the identity of the seal or stamp which the public document bears.

Cette **Apostille** atteste uniquement la véracité de la signature, la qualité en laquelle le signataire de l'acte a agi et, le cas échéant, l'identité du sceau ou timbre dont cet acte public est revêtu.

AP-2023-11-20-801

COMPULSA NOTARIAL.-

Yo, LICDA. MAGALY CALDERÓN GARCÍA, Notario Público de los del Número del Distrito Nacional, CERTIFICO Y DOY FE que, en mis libros protocolares, existe un acto pasado por ante mí, el cual transcrito íntegramente dice lo siguiente: PAGARE NOTARIAL. ACTO NÚMERO CIENTO CUARENTA Y OCHO (148).- En la Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, a los once (11) días del mes de junio del año dos mil veintiuno (2021), por ante mí, **LICDA. MAGALY CALDERÓN GARCÍA,** dominicana, mayor de edad, soltera, abogada, Notario Público de los del Número del Distrito Nacional, Colegiatura No. trece ochenta y nueve(1389), titular de la cédula de identidad y electoral No. cero [redacted] con estudio profesional abierto en la calle Pasteur No. dos cinco seis (256), Edificio Hidalgo uno (I), apto. tres cero uno (301), Sector Gazcue, Distrito Nacional, República Dominicana, han comparecido, libre y voluntariamente, en calidad de **DEUDORES CONJUNTOS Y SOLIDARIOS** los señores **WILLIAM MATTHEW HAWK**, ciudadano norteamericano, mayor de edad, soltero, identificado por el pasaporte norteamericano [redacted] con domicilio en la calle Rafael Hernandez, Torre Montecruz, Apartamento tres (3) A, Naco, Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana; **JOSÉ DALBY CONTRERAS REYES,** dominicano, mayor de edad, soltero, portador de la cédula de identidad y electoral Número [redacted] con domicilio en la avenida Sarasota número veinte (20), Edificio Torre Empresarial AIRD, Apartamento cuatro (4) Noroeste, La Julia, Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana quienes comparecen a título personal, y una vez ante mí, me han declarado libre y voluntariamente lo siguiente: **PRIMERO:** Que **RECONOCEN Y DECLARAN SER DEUDORES CONJUNTOS Y SOLIDARIOS** de la sociedad **CATRAIN BUSINESS MANAGEMENT, SRL**, constituida de conformidad a las leyes dominicanas con RNC número uno guión tres uno dos siete nueve seis cero guión dos (1-3127960-2), con domicilio social establecido en la avenida Sarasota número veinte (20), Edificio Torre Empresarial AIRD, Apartamento cuatro guión (4-) Noroeste, La Julia, de esta ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, debidamente representada por **LIC. SALVADOR CATRAIN CALDERON**, dominicano, mayor de edad, casado, abogado de profesión, portador de la cédula de identidad y electoral número [redacted] de este domicilio y residencia; por la suma de **DOSCIENTOS NOVENTA Y CINCO MIL DÓLARES NORTEAMERICANOS CON 00/100 (US$295,000.00),** por concepto de préstamo personal adquirido y recibido en esta misma fecha, y por medio al presente documento auténtico; **SEGUNDO:** Que los comparecientes se **OBLIGAN Y COMPROMETEN** a pagar los valores adeudados en pagos mensuales compuestos de capital y un ocho por ciento (8%) de interés anual fijo, de la siguiente manera: cuarenta y ocho (48) cuotas mensuales, fatales y consecutivas de **OCHO MIL CIENTO DOCE DOLARES CON 50/100 CENTAVOS DE DÓLAR (US$8,112.50)** iniciando el día diecisiete (17) de julio del año dos mil veintiuno (2021), y terminando el diecisiete (17) de junio del año dos mil veinticinco (2025); **TERCERO:** Que para fortalecer las garantías de la mencionada deuda, los comparecientes **DECLARAN COMPROMETER** la universalidad de sus bienes y derechos propios, presentes y futuros hasta el pago total y definitivo de la suma adeudada; y que de no cumplirse con la obligación de pago en cada una de las fechas y condiciones indicadas, tanto para el pago de los intereses como del capital, y por el simple incumplimiento de pago en cualquiera de las cuotas, perderán de pleno derecho el beneficio del término establecido,

AP-2023-11-20-801

haciéndose exigible inmediatamente la totalidad del monto adeudado en intereses, capital, gastos legales, y demás gastos accesorios, sin ninguna formalidad judicial o extrajudicial previa y sin necesidad de puesta en mora; **CUARTO:** Que los comparecientes reconocen que el presente pagaré notarial posee la fuerza ejecutoria de una sentencia en virtud de lo que establece el **ARTÍCULO 545 DEL CÓDIGO DE PROCEDIMIENTO CIVIL.** Hecho y pasado en mi estudio en la fecha arriba indicada y leído por entero a la compareciente, así como a los testigos instrumentales presentes, las señoras **JENNY HORTENCIA MENA DÍAZ** y **EDUARD BAUTISTA,** ambos dominicanos, mayores de edad, titulares de la cédulas de identidad y electoral números [redacted] respectivamente, domiciliados y residentes en la Ciudad de Santo Domingo de Guzmán, Distrito Nacional, Capital de la República Dominicana; quienes después de oírlo en señal de aprobación, lo firman por ante mí y junto conmigo, Notario Público que Certifico y Doy Fe, escribiendo igualmente los comparecientes, Señores **WILLIAM MATTHEW HAWK** y **JOSÉ DALBY CONTRERAS REYES,** de su puño y letra lo siguiente. **"BUENO Y VÁLIDO POR LA SUMA DE DOSCIENTOS NOVENTA Y CINCO MIL DÓLARES NORTEAMERICANOS CON 00/100 (US$295,000.00)". Espacio para escribir "BUENO Y VÁLIDO POR LA SUMA DE DOSCIENTOS NOVENTA Y CINCO MIL DOLARES NORTEAMERICANOS CON 00/100 (US$295,000.00)." Que certifico y doy fe.**- Firmado, **WILLIAM MATTHEW HAWK,** (Declarante), y **JOSÉ DALBY CONTRERAS REYES,** (Declarante), **JENNY HORTENCIA MENA DÍAZ,** (Testigo), y **EDUARD BAUTISTA,** (Testigo), **LICDA. MAGALY CALDERÓN GARCÍA,** (Notario Público). Registrado en Santo Domingo, Distrito Nacional, capital de la República Dominicana, en fecha veintinueve (29) de septiembre del año dos mil veintidós (2022), Letra DG-AC, Registro No. 2022-52503, registrado en la dirección del Registro Civil y Conservaduría de Hipotecas. Expedida la **PRIMERA** copia fiel y conforme a su original, a solicitud de la parte interesada. En la ciudad de Santo Domingo, Distrito Nacional, capital de la República Dominicana, en fecha veintinueve (29) de septiembre del año dos mil veintidós (2022).-

LICDA. MAGALY CALDERÓN GARCÍA
Notario Público
Matrícula No. 1389.-

LICDA. MAGALY CALDERON GARCÍA
NOTARIO PUBLICO

LIC. MAGALY CALDERON GARCIA ABOGADO NOTARIO PUBLICO Mat. 1389 Santo Domingo, Dist. Nac.

PAGARE NOTARIAL

ACTO NÚMERO CIENTO CUARENTA Y OCHO (148).- En la Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, a los once (11) días del mes de junio del año dos mil veintiuno (2021), por ante mí, **LICDA. MAGALY CALDERÓN GARCÍA,** dominicana, mayor de edad, soltera, abogada, Notario Público de los del Número del Distrito Nacional, Colegiatura No. 1389, titular de la cédula de identidad y electoral No. 001-0060797-7, con estudio profesional abierto en la calle Pasteur No. 256, Edificio Hidalgo I, apto. 301, Sector Gazcue, Distrito Nacional, República Dominicana, han comparecido, libre y voluntariamente, en calidad de **DEUDORES CONJUNTOS Y SOLIDARIOS** los señores **WILLIAM MATTHEW HAWK**, ciudadano norteamericano, mayor de edad, soltero, identificado por el pasaporte norteamericano número cinco seis siete cuatro siete tres tres ocho siete (No. 567473387), con domicilio en la calle Rafael Hernandez, Torre Montecruz, Apartamento 3 A, Naco, Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana; **JOSÉ DALBY CONTRERAS REYES,** dominicano, mayor de edad, soltero, portador de la cédula de identidad y electoral Número cero cinco dos guion cero cero uno cero dos nueve nueve guion tres (052-0010299-3), con domicilio en la avenida Sarasota número veinte (20), Edificio Torre Empresarial AIRD, Apartamento cuatro (4) Noroeste, La Julia, Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana quienes comparecen a título personal, y una vez ante mí, me han declarado libre y voluntariamente lo siguiente: **PRIMERO:** Que **RECONOCEN Y DECLARAN SER DEUDORES CONJUNTOS Y SOLIDARIOS** de la sociedad **CATRAIN BUSINESS MANAGEMENT, SRL,** constituida de conformidad a las leyes dominicanas con RNC número uno guión tres uno dos siete nueve seis cero guión dos (1-3127960-2), con domicilio social establecido en la avenida Sarasota número veinte (20), Edificio Torre Empresarial AIRD, Apartamento 4-Noroeste, La Julia, de esta ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, debidamente representada por **LIC. SALVADOR CATRAIN CALDERON**, dominicano, mayor de edad, casado, abogado de profesión, portador de la cédula de identidad y electoral número cero cero uno guion cero cero seis dos cinco cinco cuatro guion cero (001-0062554-0), de este domicilio y residencia; por la suma de **DOSCIENTOS NOVENTA Y CINCO MIL DÓLARES NORTEAMERICANOS CON 00/100 (US$295,000.00),** por concepto de préstamo personal adquirido y recibido en esta misma fecha, y por medio al presente documento auténtico; **SEGUNDO:** Que los comparecientes se **OBLIGAN Y COMPROMETEN** a pagar los valores adeudados en pagos mensuales compuestos de capital y un ocho por ciento (8%) de interés anual fijo, de la siguiente manera: cuarenta y ocho (48) cuotas mensuales, fatales y consecutivas de **OCHO MIL CIENTO DOCE DOLARES CON 50/100 CENTAVOS DE DÓLAR (US$8,112.50)** iniciando el día diecisiete (17) de julio del año dos mil veintiuno (2021), y terminando el diecisiete (17) de junio del año dos mil veinticinco (2025); **TERCERO:** Que para fortalecer las garantías de la mencionada deuda, los comparecientes **DECLARAN COMPROMETER** la universalidad de sus bienes y derechos propios, presentes y futuros hasta el pago total y definitivo de la suma adeudada; y que de no cumplirse con la obligación de pago en cada una de las fechas y condiciones indicadas, tanto para el pago de los intereses como del capital, y por el simple incumplimiento de pago en cualquiera de las cuotas, perderán de pleno derecho el beneficio del término establecido, haciéndose exigible inmediatamente la totalidad del monto adeudado en intereses, capital, gastos legales, y demás gastos accesorios, sin ninguna formalidad judicial o extrajudicial previa y sin necesidad de puesta en mora; **CUARTO:** Que los comparecientes reconocen que el presente pagaré notarial

Ayuntamiento del Distrito Nacional Dirección de Registro Civil y Conservaduría de Hipotecas

posee la fuerza ejecutoria de una sentencia en virtud de lo que establece el **ARTÍCULO 545 DEL CÓDIGO DE PROCEDIMIENTO CIVIL.** Hecho y pasado en mi estudio en la fecha arriba indicada y leído por entero a la compareciente, así como a los testigos instrumentales presentes, las señoras **JENNY HORTENCIA MENA DÍAZ** y **EDUARD BAUTISTA,** ambos dominicanos, mayores de edad, titulares de la cédulas de identidad y electoral números cuatro, cero, dos, guion, dos, cero, seis, uno, uno, siete, tres, guion, uno, (402-2061173-1) y cero, cero, uno, guion, uno, siete, siete, seis, cero, cero, ocho, guion, dos (001-1776008-2) respectivamente, domiciliados y residentes en la Ciudad de Santo Domingo de Guzmán, Distrito Nacional, Capital de la República Dominicana; quienes después de oírlo en señal de aprobación, lo firman por ante mí y junto conmigo, Notario Público que Certifico y Doy Fe, escribiendo Igualmente los comparecientes, Señores **WILLIAM MATTHEW HAWK** y **JOSÉ DALBY CONTRERAS REYES,** de su puño y letra lo siguiente. **"BUENO Y VÁLIDO POR LA SUMA DE DOSCIENTOS NOVENTA Y CINCO MIL DÓLARES NORTEAMERICANOS CON 00/100 (US$295,000.00)".**

Espacio para escribir "BUENO Y VÁLIDO POR LA SUMA DE DOSCIENTOS NOVENTA Y CINCO MIL DOLARES NORTEAMERICANOS CON 00/100 (US$295,000.00)."

1.- BUENO Y VALIDO POR LA SUMA DE DOSCIENTOS NOVENTA Y CINCO MIL DOLARES NORTEAMERICANOS CON 00/100 (US$295,000.00)

2.- Bueno y valido por la suma de Doscientos noventa y Cinco mil Dolares Norteamericanos con 00/100 (US$295,00.)

WILLIAM MATTHEW HAWK,
DEUDOR DECLARANTE-COMPARECIENTE.-

JOSÉ DALBY CONTRERAS REYES,
DEUDOR DECLARANTE-COMPARECIENTE.-

Jenny Mena

SRA. JENNY HORTENCIA MENA,
TESTIGO.-

Eduard B.

SR. EDUARD BAUTISTA,
TESTIGO.-

MAGALY CALDERON GARCIA ABOGADO NOTARIO PUBLICO Mat. 1389 Santo Domingo, Dist. Nac.

LICDA. MAGALY CALDERÓN GARCÍA
NOTARIO PÚBLICO.-

ADN
Ayuntamiento Distrito Nacional
Registrado en Santo Domingo, D.N.
En Fecha: 29/09/2022
Registro: 2022-52503
Documento: ACTOS DIVERSOS
Pagado por derecho y timbres
RD$ 1,500.00
103

EXHIBIT B

República Dominicana

MINISTERIO DE RELACIONES EXTERIORES

Viceministerio para Asuntos Consulares y Migratorios

Dirección de Legalización de Documentos

APOSTILLA

(Convention de la Haye du 5 octobre 1961)

1.País:
Country / Pays: REPÚBLICA DOMINICANA

El presente documento público
This public document / Le présent acte public

2.Ha sido firmado por:
Has been signed by / A été signé par: SILBETRE ESPEDITO VENTURA COLLADO

3.Quien actúa en calidad de:
Acting in the capacity of / Agissant en qualité de: ENCARGADO DEPARTAMENTO DE CERTIFICACIONES

4.Y está revestido del sello / timbre de:
Bears the seal / stamp of
Est revétu du sceau / timbre de: DIRECCIÓN GENERAL DE MIGRACIÓN

Certificado
Certified / Attesté

5.En:
At / Á: SANTO DOMINGO

6.El día:
The / Le: 25/9/2024

7.Por:
By / Par: OPINIO ANTONIO DIAZ VARGAS - VICEMINISTRO ASUNTOS CONSULARES Y MIGRATORIOS

8.Bajo el número:
N° / Sous°: AP-2024-9-25-457

9.Sello / Timbre:
Seal / Stamp
Sceau / Timbre

10.Firma:
Signature

Verificación
Verification / Vérification

Pais Destino:	ESTADOS UNIDOS DE AMÉRICA	**Código de verificación:**	67X3UZJVCTKXTCB

Esta Apostille certifica únicamente la autenticidad de la firma, la calidad en que el signatario del documento haya actuado, y en su caso, la identidad del sello o timbre del que el documento público este revestido.

This Apostille only certifies the authenticity of the signature and the capacity of the person who has signed the public document, and, where appropriate, the identity of the seal or stamp which the public document bears.

Cette Apostille atteste uniquement la véracité de la signature, la qualité en laquelle le signataire de l'acte a agi et, le cas échéant, l'identité du sceau ou timbre dont cet acte public est revêtu.

REPUBLICA DOMINICANA

Ministerio de Interior y Policía

DIRECCIÓN GENERAL DE MIGRACIÓN

AP-2024-9-25-457

CERTIFICACION PARA FINES JUDICIALES

Núm. 34323

Quien suscribe, **SILBESTRE VENTURA COLLADO**, encargado del Departamento de Certificaciones de esta Dirección General de Migración, hace constar los movimientos migratorios de **entradas y salidas del** país en el período **2021 hasta el 18 de septiembre del 2024** de **JOSE DALBY CONTRERAS,** de nacionalidad **Estadounidense**, fecha de nacimiento **09/12/1980, Pasaporte** [redacted] según datos verificados en nuestro sistema de archivos computarizados, lo que certifico para los fines de lugar.

SALIDAS	ENTRADAS
12/03/2021	15/03/2021
26/03/2021	04/04/2021
27/05/2021	15/06/2021
08/07/2021	10/07/2021
04/08/2021	08/08/2021
04/09/2021	02/10/2021
06/11/2021	17/11/2021
26/11/2021	01/12/2021
10/03/2022	18/03/2022
26/03/2022	30/04/2022
07/05/2022	24/05/2022
14/06/2022	27/06/2022
13/08/2022	02/09/2022
14/09/2022	08/10/2022

REPUBLICA DOMINICANA

Ministerio de Interior y Policía

DIRECCIÓN GENERAL DE MIGRACIÓN

AP-2024-9-25-457

SALIDAS	ENTRADAS
16/10/2022----------	----------29/10/2022
05/11/2022----------	----------02/12/2022
05/12/2022----------	----------08/02/2023
15/02/2023----------	----------27/05/2023
31/05/2023----------	----------04/07/2023
26/08/2023----------	----------03/10/2023
04/10/2023----------	----------30/12/2023
05/01/2024----------	----------17/01/2024
18/01/2024----------	

Dado en Santo Domingo, capital de la República Dominicana, a los diecinueve (19) días del mes septiembre del año dos mil veinticuatro (2024).

DIRECCIÓN GENERAL DE MIGRACIÓN Departamento de Certificaciones Santo Domingo, Rep. Dom.

DR. SILBESTRE VENTURA COLLADO
Encargado del Departamento de Certificaciones

R.M.

MANUEL EMILIO SANTOS JIMÉNEZ
JUDICIAL INTERPRETER

I, **MANUEL EMILIO SANTOS JIMÉNEZ**, judicial interpreter and legal translator of the Dominican Republic, duly appointed for the exercise of my functions by resolution no. 13/2014 of the Council of the Judiciary of the Dominican Republic, declare that I have translated a document issued in the Spanish language, whose version in the English language, in the opinion of the writer, is as follows:

[Emblem]

[Coat of arms of the Dominican Republic]
DOMINICAN REPUBLIC

Ministry of Interior and Police
General Directorate of Migration

Certification for Judicial Purposes

No. 34321

The undersigned, **SILBESTRE VENTURA COLLADO**, head of the Certification Department of this General Directorate of Migration, certifies the migration movements of **entries** and **exits** of the country in the period from **2021 to September 18, 2024,** of**Jose Dalby Contreras,** of **American** nationality, born on **09/12/1980,** Passport No. [redacted], according to verified data in our computerized archive system, which I certify for the relevant purposes.

Exits	Entries
21/01/2021	28/01/2021
10/03/2021	20/03/2021
25/03/2021	10/04/2021
23/04/2021	24/04/2021
06/05/2021	13/05/2021
16/05/2021	23/05/2021
27/05/2021	15/06/2021
05/08/2021	12/08/2021
22/08/2021	26/08/2021
07/10/2021	12/10/2021
31/10/2021	19/11/2021
18/12/2021	19/12/2021
08/01/2022	25/01/2022
18/01/2022	15/02/2022
07/03/2022	05/04/2022
26/03/2022	30/04/2022
07/05/2022	24/05/2022
02/06/2022	03/06/2022

[Coat of arms of the Dominican Republic]
DOMINICAN REPUBLIC

Ministry of Interior and Police
General Directorate of Migration

Exits	Entries
06/06/2022	10/06/2022
14/06/2022	30/06/2022
12/07/2022	19/07/2022
29/07/2022	09/08/2022
13/08/2022	02/09/2022
12/10/2022	29/10/2022
05/11/2022	08/10/2022
11/01/2023	06/01/2023
15/07/2023	Unregistered
07/08/2023	22/07/2023
26/08/2023	18/08/2023
05/01/2024	30/12/2023
23/03/2024	19/03/2024
18/05/2024	07/05/2024
26/07/2024	21/07/2024

Issued in Santo Domingo, capital of the Dominican Republic, on the nineteenth (19) day of the month of September of the year Two Thousand Twenty-Four (2024).

[Signature]
DR. SILBESTRE VENTURA COLLADO
Head of the Department of Certifications
[Seal]

Av. George Washington, with Héroes de Luperón, Centro de los Héroes, Santo Domingo, D. R. • Tel: 809-508-2555
despacho@migracion.gob.do • www.migracion.gob.do

I CERTIFY: That the preceding is a faithful translation of the original document issued in the Spanish language, to which I apply my seal and signature, registering it with No. 796-2024, in Book 1, Folio 250 of my record. In the city of Santiago de los Caballeros, municipality and province of Santiago, Dominican Republic, on September 25, 2024.

MANUEL EMILIO SANTOS JIMENEZ
Judicial Interpreter

LIC. MANUEL EMILIO SANTOS JIMENEZ
INTERPRETE JUDICIAL
Exequátur No. [illegible]

República Dominicana

MINISTERIO DE RELACIONES EXTERIORES

Viceministerio para Asuntos Consulares y Migratorios

Dirección de Legalización de Documentos

APOSTILLA

(Convention de la Haye du 5 octobre 1961)

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4.Y está revestido del sello / timbre de:
Bears the seal / stamp of
Est revétu du sceau / timbre de: DIRECCIÓN GENERAL DE MIGRACIÓN

Certificado
Certified / Attesté

5.En:
At / Á: SANTO DOMINGO

6.El día:
The / Le: 25/9/2024

7.Por:
By / Par: OPINIO ANTONIO DIAZ VARGAS - VICEMINISTRO ASUNTOS CONSULARES Y MIGRATORIOS

8.Bajo el número:
N° / Sous°: AP-2024-9-25-486

9.Sello / Timbre:
Seal / Stamp
Sceau / Timbre

10.Firma:
Signature

Verificación
Verification / Vérification

País Destino:	ESTADOS UNIDOS DE AMÉRICA	**Código de verificación:**	R2QJSRJY77HK9EA

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REPUBLICA DOMINICANA

Ministerio de Interior y Policía

DIRECCIÓN GENERAL DE MIGRACIÓN

AP-2024-9-25-486

CERTIFICACION PARA FINES JUDICIALES

Núm. 34321

Quien suscribe, **SILBESTRE VENTURA COLLADO**, encargado del Departamento de Certificaciones de esta Dirección General de Migración, hace constar los movimientos migratorios de **entradas y salidas del** país en el período **2021 hasta el 18 de septiembre del 2024** de **WILLIAM MATTHEW HAWK,** de nacionalidad **Estadounidense**, fecha de nacimiento **29/06/1981, Pasaporte** [redacted] según datos verificados en nuestro sistema de archivos computarizados, lo que certifico para los fines de lugar.

SALIDAS	ENTRADAS
21/01/2021	28/01/2021
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23/04/2021	24/04/2021
06/05/2021	10/05/2021
16/05/2021	23/05/2021
27/05/2021	15/06/2021
05/08/2021	10/08/2021
22/08/2021	26/08/2021
04/09/2021	02/10/2021
07/10/2021	09/10/2021
31/10/2021	10/12/2021
18/12/2021	19/12/2021
08/01/2022	12/01/2022
18/01/2022	25/01/2022
07/03/2022	18/03/2022
26/03/2022	05/04/2022
06/04/2022	30/04/2022
07/05/2022	24/05/2022
02/06/2022	03/06/2022

REPUBLICA DOMINICANA

Ministerio de Interior y Policía

DIRECCIÓN GENERAL DE MIGRACIÓN

AP-2024-9-25-486

SALIDAS	ENTRADAS
06/06/2022	10/06/2022
14/06/2022	30/06/2022
12/07/2022	19/07/2022
29/07/2022	09/08/2022
13/08/2022	02/09/2022
14/09/2022	08/10/2022
12/10/2022	29/10/2022
05/11/2022	06/01/2023
11/01/2023	09/02/2023
15/02/2023	No registrada
15/07/2023	22/07/2023
17/08/2023	18/08/2023
26/08/2023	30/12/2023
05/01/2024	19/03/2024
23/03/2024	07/05/2024
18/05/2024	21/07/2024
26/07/2024	

Dado en Santo Domingo, capital de la República Dominicana, a los diecinueve (19) días del mes septiembre del año dos mil veinticuatro (2024).

DIRECCION GENERAL DE MIGRACION
Departamento de Certificaciones
Santo Domingo

DR. SILBESTRE VENTURA COLLADO
Encargado del Departamento de Certificaciones

R.M.

MANUEL EMILIO SANTOS JIMÉNEZ
JUDICIAL INTERPRETER

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[Emblem]

[Coat of arms of the Dominican Republic]
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Ministry of Interior and Police
General Directorate of Migration

Certification for Judicial Purposes

No. 34321

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Exits	Entries
21/01/2021	28/01/2021
10/03/2021	20/03/2021
25/03/2021	10/04/2021
23/04/2021	24/04/2021
06/05/2021	13/05/2021
16/05/2021	23/05/2021
27/05/2021	15/06/2021
05/08/2021	12/08/2021
22/08/2021	26/08/2021
07/10/2021	12/10/2021
31/10/2021	19/11/2021
18/12/2021	19/12/2021
08/01/2022	25/01/2022
18/01/2022	15/02/2022
07/03/2022	05/04/2022
26/03/2022	30/04/2022
07/05/2022	24/05/2022
02/06/2022	03/06/2022

[Coat of arms of the Dominican Republic]
DOMINICAN REPUBLIC

Ministry of Interior and Police
General Directorate of Migration

Exits	Entries
06/06/2022	10/06/2022
14/06/2022	30/06/2022
12/07/2022	19/07/2022
29/07/2022	09/08/2022
13/08/2022	02/09/2022
12/10/2022	29/10/2022
05/11/2022	08/10/2022
11/01/2023	06/01/2023
15/07/2023	Unregistered
07/08/2023	22/07/2023
26/08/2023	18/08/2023
05/01/2024	30/12/2023
23/03/2024	19/03/2024
18/05/2024	07/05/2024
26/07/2024	21/07/2024

Issued in Santo Domingo, capital of the Dominican Republic, on the nineteenth (19) day of the month of September of the year Two Thousand Twenty-Four (2024).

[Signature]
DR. SILBESTRE VENTURA COLLADO
Head of the Department of Certifications
[Seal]

Av. George Washington, with Héroes de Luperón, Centro de los Héroes, Santo Domingo, D. R. • Tel: 809-508-2555
despacho@migracion.gob.do • www.migracion.gob.do

I CERTIFY: That the preceding is a faithful translation of the original document issued in the Spanish language, to which I apply my seal and signature, registering it with No. 795-2024, in Book 1, Folio 250 of my record. In the city of Santiago de los Caballeros, municipality and province of Santiago, Dominican Republic, on September 25, 2024.

MANUEL EMILIO SANTOS JIMENEZ
Judicial Interpreter

LIC. MANUEL SANTOS JIMENEZ
Intérprete Judicial
Santiago, Rep. Dom.

EXHIBIT C

IN THE CIRCUIT COURT OF THE 11th JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CIRCUIT CIVIL DIVISION

CATRAIN BUSINESS MANAGEMENT, S.L.R.,

Plaintiff,

vs.

WILLIAM MATTHEW HAWK, and JOSE DALBY CONTRERAS REYES,

Defendants.

_____/

CASE NO. 2024-015694 CA 09

Verified Amended Complaint[1]

Plaintiff, Catrain Business Management, S.L.R. ("Plaintiff"), hereby sues and files this Verified Amended Complaint for Breach of Promissory Note, against Defendants William Matthew Hawk and Jose Dalby Contreras Reyes (collectively "Defendants"), and alleges as follows:

1. Plaintiff is a company in the Dominican Republic.

2. Defendants reside in, conduct business in, and/or own real property in Miami-Dade County, Florida.

3. In June 2021, the Parties entered into a Promissory Note ("Note") [**Ex. 1**].[2]

4. Per the terms of the Note, the Defendants are debtors and personally liable to Plaintiff in the amount of $295,000.

---

[1] Plaintiff is permitted to file this Verified Amended Complaint as a matter of right because Defendants have not filed an Answer to the initial Complaint (which was served on Defendants on September 10, 2024).

[2] The Note is in Spanish, so attached is the Spanish version and the certified English version.

5. Per the terms of the Note, Defendants agreed to pay Plaintiff monthly payments composed of principal and 8% fixed annual interest for 48 months for $8,112.50 per month.

6. Per the terms of the Note, the 48 monthly payments were to be paid between July 17, 2021 – June 17, 2025.

7. Per the terms of the Note, the Defendants "commit[ted their own assets," [] "and that if the payment obligations were not complied with on each of the dates and conditions indicated, both for the payment of interest and principal, and for the simple failure to pay any of the installments, [Defendants] shall lose the benefit of the established term as of right becoming immediately due the total amount owed in interest capital, legal expenses, and other accessory expenses, without any previous judicial or extrajudicial formality and without the need of default."

8. Per the terms of the Note, "the parties acknowledge that the present notarial promissory note has the enforceable force of a judgment."

9. In accordance with the terms of the Note, Defendants paid Plaintiff 25 payments, between July 2021 – September 2023, for a total of $153,645.75.

10. September 2023 was the last payment that Defendants made to Plaintiff.

11. As such, Defendants have failed to make any additional payments since September 2023 and are therefore in default and breach of the Note for the remaining principal amount of $141,354.25, plus interest in the amount of $23,600.04, plus any additional pre-judgment and/or post-judgment interest that may be allowable under Florida law.

12. The amount in controversy greatly exceeds the $50,000 threshold to file this action in this Miami-Dade County, Florida Circuit Court.

13. Jurisdiction and Venue are proper in Miami-Dade County, Florida.

14. Any conditions necessary to the bringing of this action (if any) have been performed, occurred or have been waived.

15. Plaintiff has agreed to pay the undersigned law firm reasonable attorney's fees.

Count I – Breach of Promissory Note[3]

16. Plaintiff adopts and incorporates Paragraphs 1-15 as if set forth herein.

17. In June 2021, Defendants executed and delivered a Note **[Ex. 1]**, to Plaintiff.

18. Plaintiff owns and holds the Note.

19. Since October 2023, Defendants have failed to pay any of the installment payments due on the Note, and Plaintiff elects to accelerate payment of the balance due.

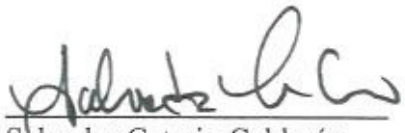
20. Defendants owe Plaintiff the remaining principal amount of the Note of $141,354.25, plus interest in the amount of $23,600.04, plus any additional pre-judgment interest since October 2023 and/or post-judgment interest that may be allowable under Florida law.

21. Plaintiff is obligated to pay its undersigned counsel a reasonable attorney fee for his legal services.

WHEREFORE, Plaintiff demands judgment for monetary damages against Defendants, plus interest, and further demands attorney's fees per the terms of the Note, and taxable costs.

Verification

Under the penalties of perjury, I, Salvador Catrain Calderón, declare that I have provided my undersigned counsel the foregoing material facts, in order for my undersigned counsel to, in good faith, rely upon the foregoing material facts in order to prepare and file this Verified Amended Complaint, and the foregoing material facts are true and accurate based on my personal knowledge.



Salvador Catrain Calderón

[3] Plead in conformity with Form 1.934 [Promissory Note] of Florida Rules of Civil Procedure.

Dated: September 26, 2024

Respectfully submitted,

RUSSOMANNO & BORRELLO, P.A.
Attorneys for Plaintiff Catrain Business Management, S.L.R.
Museum Tower – Penthouse 2800
150 West Flagler Street
Miami, Florida 33130
Telephone: (305) 373-2101
Facsimile: (305) 373-2103

By: /s/ Herman J. Russomanno III
Herman J. Russomanno III
Fla. Bar No. 21249
herman2@russomanno.com

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served on this 26th day of September, 2024, to Defendants via email through the Court's e-portal system.

/s/ Herman J. Russomanno III

EXHIBIT D

Patricia J. Hale
Expert Forensic Document Examiner
Phone: 216.302.4155
E-mail: ForensicForgeryExperts@gmail.com
www.ForensicForgeryExperts.com

Education. Training and Background:

July 2021 to present: Owner of Forensic Forgery Experts, Expert Document Examiner and Handwriting Expert. I have completed and rendered expert opinions on over 175 cases.

March 4, 2017 to present: Staff Expert with Curt Baggett, who is a Leading Expert Document Examiner and Handwriting Expert in the USA. Over 2,000 cases prepared, examined and reviewed. Prepared and attended over 100 legal cases for Depositions and Court Testimony.

April 1, 2020: Webinar Training with Experts.com. Subject: 7 Things an Expert Witness Must Know for Deposition & Trial. Trainer & Co-host: Trial lawyer, Mitch Jackson, taught the 7 items he wishes all expert witnesses knew before deposition and trial. Mitch Jackson, Esq., is a senior partner at Jackson & Wilson Trial Lawyers, in Orange County, California. Mitch Jackson earned the award of 2013 California Lawyer of the Year.

June 6-8, 2018: Instructor via written presentation at the 18th Wroclaw Symposium of Questioned Document Examination at University of Wroclaw in Poland June 6-8, 2018.

March 4, 2015 thru March 4, 2017: Intense 2-year training / Apprenticeship hands on cases with the Leading Document Examiner and Handwriting Expert in the U.S.A., Curt Baggett. Completion of 2-year course with Certificate of Excellence.

2016: Attended Handwriting University International Handwriting Conference in Las Vegas, NV (Sept.). This was a 3-day weekend with Leading Expert Speakers from the U.S. and India.

July 2011 - December 2014: Legal Assistant for Attorney David M. Lynch in Euclid, Ohio.

2014: Candidate for Trumbull County Commissioner in Ohio. Speaking Events in the County.

2012: Candidate for Ohio House Representative in District 63, Ohio. Speaking Events in District.

2011 – 2012: The Ohio Project's NE Ohio District Coordinator. Grassroots effort that amended the State of Ohio Constitution to protect Citizens' right to opt out of Mandated Health Care with no fines or penalties. Worked with 18 NE Ohio County Coordinators. Phone conferences with State Coordinator, Legal Coordinator, 4 additional OH District Coordinators (SE, NW, SW & Central).

2005 - 2013: Owner and Instructor/Teacher of Private Piano Studio. Managed student participation in Recitals, Ohio Federation of Music Clubs Festival, Competitions.

2002 - 2015: Ohio Federation of Music Clubs / OFMC Chair (Director) for Annual Music Festival at Youngstown State University. Over 100 students participated in over 300 events.

April 1996 to 2004: Market America Unfranchise Business Owner, reaching the level of Supervising Coordinator within 3 years. Certified Executive Coordinator Trainer, New Distributor Trainer, Basic 5 Trainer, Speaker at Local Seminars and Regional Convention in Cincinnati, OH.

1975: Attended Associated Airline Travel Agency School – Graduated Scholastically Highest in Class

1975: Earned Private Pilot License (Single Engine Land)

1975: Graduate, McDonald High School with the Highest number of Credits in the field of College Prep

1975: President of G.A.A. (Girl's Athletic Association) at McDonald High School

1968 to 1975: High School Pianist and Accompanist. Orchestra, Marching Band Squad Leader, Concert Band, Pep Band, Solo and Ensemble Contests
Sports: Softball (both slow and fast pitch team leagues), Volleyball, Track, Synchronized Swim Team 4 yrs.

Personal Background: Steelworker (welder for 6 years), Business Owner, Advocate for Children and Justice, Sunday School Teacher, Mother of Three Children – Two who served in the USAF Reserves.

Court Case SUMMARY

I have been qualified and/or appointed and/or accepted by a State or Federal Court as an Expert, and/or have testified in trial or by deposition or made an appearance from August 2022 through August 2024 in the following cases and/or cities.

August 10, 2022	In the Twentieth Judicial Circuit of Virginia, Fauquier County Circuit Court, North Courtroom, Warrenton, VA / Case No. CL20-437 / Judge Dennis L. Hupp / Court PH: 540-422-8100 / Driton Sadiku V. Melanie N. Sadiku / Atty. for Defendant: John C. Whitbeck Jr. / **Expert Patricia J. Hale Testified in Courtroom remotely via Zoom for Defendant /** Judge Dennis Hupp agrees with Handwriting Expert, Patricia Hale and rules a forgery, exactly as Expert Hale testified. Melanie Sadiku wins.
September 13, 2022	In the Seventh District Court in Emery County, Castle Dale, UT 84513 Judge Harmond / In the Estate of Margaret Doris Jones Atty. M'Kay Driggs, Rogers & Russell Legal Solutions for Plaintiff **Expert Patricia J. Hale Testified in Courtroom remotely via zoom.**

September 23, 2022	In the Court of Common Pleas Criminal Division Summit County, OH Case No. CR 2020-01-0316 / Judge Susan Baker Ross State of Ohio, Plaintiff VS. Dustin C. Austin, Defendant Atty. Charles Quinn for Defendant **Expert Patricia J. Hale Testified in Courtroom remotely via zoom.**
March 30, 2023	In the Superior Court of the State of Arizona, County of Navajo Judge Jon H. Saline / Case No. DO2020-00202 / Court PH: 928-532-4529 Atty. Eduardo Coronado for Petitioner, Loree Donovan **Expert Patricia J. Hale Testified in Courtroom remotely via phone.**
June 14, 2024	(Hearing) In the Court of Common Pleas, Summit County, Akron, OH Case No. CV-24-01-0348 / Judge Alison McCarty Shaun Jaber, Plaintiff VS. Mansour Kahook, et al, Defendants Atty. Michael Callahan for Defendant, Mansour Kahook **Expert Patricia J. Hale Testified in Courtroom In Person for Defendant.**
July 2, 2024	(Pre-Trial Hearing) In Cabell County Circuit Court, West Virginia, 2nd floor Courtroom 2 / 20-F-140 / State V. Robin Nolan / Judge Greg Howard Atty. Tim Rosinsky for Robin Nolan **Expert Patricia J. Hale Testified in Courtroom remotely via zoom.** Case Settled afterwards.
July 22, 2024	In the Court of Common Pleas, Domestic Relations Division, Trumbull County, Warren, OH / Case No. 2023 DR 273 / Judge Samuel F. Bluedorn David L. Durch, Plaintiff VS. Rose A. Durch, Defendant Atty. Anthony Rossi III for Plaintiff **Expert Patricia J. Hale In Person Appearance at Courthouse. Case Settled while waiting outside of courtroom to testify.**
August 16, 2024	(Hearing continued from 6-14-24) In the Court of Common Pleas, Summit County, Case No. CV-24-01-0348 / Judge Alison McCarty Akron, OH Shaun Jaber, Plaintiff VS. Mansour Kahook, et al, Defendants Atty. Michael Callahan for Defendant, Mansour Kahook **Expert Patricia J. Hale Testified Remotely in Courtroom.**
December 12, 2024	In The Common Pleas Court, Coshocton County, Ohio, Probate Division Case No. 20221129A / Judge Jason W. Given / Shannon Murphy, Plaintiff vs. Loretta Lynn Markely, et at., Defendants / Atty. Stephen A. Eckinger for Plaintiff **Expert Patricia J. Hale Testified in Courtroom in Person for Plaintiff.**
January 9, 2025	In the Common Pleas Court, Probate Division of Warren County, Lebanon, OH Case No. 20232066 & 20232081 / Judge Joseph W. Kirby / In the Matter of: Guardianship of: Judth J. Reed / Atty. Stephen Imms for Todd Reed **Expert Patricia J. Hale Testified in Courtroom remotely via zoom.**

Patricia J. Hale
Forensic Document Examiner
"Lake Texoma"
26 J Street / Pottsboro, Texas 75076
Office: 216-302-4155
e-mail: info@forensicforgeryexperts.com
Web: www.ForensicForgeryExperts.com

FFE
Forensic Forgery Experts
Discovering Truth Using Forensic Handwriting Analysis

Questioned Document Examiner Letter

Subject: **Jenny Hortencia Mena**
Date: February 21, 2025

I have examined eight (8) documents with the known signatures of Jenny Mena. For the purpose of this examination, I have labeled these exhibits 'K1' through 'K8'.

Today I have compared the signatures of Jenny Mena on the 'K' documents to the Jenny Mena signature on the questioned document, identified herein as **'Q1'**, to determine if the author of the Jenny Mena signatures on the 'K' documents was the same person who authored the name of Jenny Mena on the questioned document: **'Q1': Dominican Republic Apostille Certified at Santo Domingo on 11/20/2023, with Notarial Certification on Notarial PROMISSORY NOTE in the City of Santo Domingo, National District, Capital of the Dominican Republic on June 11th, 2021 and purportedly signed by Jenny Hortencia Mena. (for Case 1:24-cv-23918-RNS)**

An examination of handwriting includes establishing patterns of writing habits to help identify the author. Handwriting is formed by repeated habits of writing by the author, which are created by neuro-pathways established in the brain. These neuro-pathways control muscular and nerve movement for writing, whether the writing done is by the hand, foot or mouth.

In support of my opinion, I have included an excerpt from *Handwriting Identification, Facts and Fundamentals* by Roy A. Huber and A.M. Headrick (CRC Press LLC, 1999, pp 50-51) wherein the leading forefathers of document examination in the USA agree that one significant difference in the fundamental structure of a writing compared to another is enough to preclude common authorship:

> [Ordway] Hilton stated: "It is basic axiom of identification in document problems that a limited number of basic differences, even in the face of numerous strong similarities, are controlling and accurately establish nonidentity."
>
> [Wilson R.] Harrison made similar comments: "...the fundamental rule of which admits of no exception when handwritings are being compared...is simple – whatever features two specimens of handwriting may have in common, they cannot be considered to be of

> uncommon authorship if they display but a single consistent dissimilarity in any feature which is fundamental to the structure of the handwriting, and whose presence is not capable of reasonable explanation."
>
> [James V.P.] Conway expressed the same theme when he wrote: "A series of fundamental agreements in identifying individualities is requisite to the conclusion that two writings were authored by the same person, whereas a single fundamental difference in an identifying individuality between two writings precludes the conclusion that they were executed by the same person."

And finally,

> [Albert S.] Osborn and others have generally agreed that despite numerous similarities in two sets of writings, a conclusion of identity cannot be made if there is one or more differences in fundamental features of the writings.

METHODOLOGY

A Meticulous examination of the questioned signature to the known signatures was conducted using a side-by-side comparison with the unaided eye, handheld magnifying loupes, microscope, photocopy enlargements, grids, a light table, and metric measuring devices. The scientific methodology used in this examination consists of the 'ACE' methodology, which means 'Analyze, Compare, and Evaluate'. The FBI, U.S. Treasury Department, and the US Postal Services reportedly use this reliable methodology in their questioned document laboratories. ASTM recommends this methodology as the standard in this field. This methodology was also accepted and affirmed by the District of Columbia Court of Appeals in Case No. 08-CF-1361, *Pettus V. United States*. In addition, this examiner adds the Peer Review Methodology, which requests a second independent examination by a qualified handwriting expert.

The techniques promulgated by the scientific community in the forensic document examination field generate reliable results and are generally accepted.

Based upon thorough analysis of these items, and from an application of accepted forensic document examination tools, principles and techniques, it is my professional expert opinion **that a different person authored the name of Jenny Mena on the questioned document. Someone did indeed forge the signature of Jenny Mena on the questioned document, 'Q1'.**

I am willing to testify in a deposition or court of law regarding the above-mentioned examination and expert opinion, provided that I am contacted prior to setting a date for such testimony to avoid scheduling conflicts and to allow adequate time for preparation.

Respectfully submitted,

Patricia J. Hale

Patricia J. Hale

The above Letter of Opinion was sworn and subscribed before me by Patricia J. Hale this 21 day of February, 2025.

State of Texas §
§
§
County of Grayson §

Notary Public – State of Texas

ZACKERY ATKINS
Notary ID #133724291
My Commission Expires
April 25, 2026

LEGAL DATA

UNITED STATES v. JANET L. THORNTON

Case No. 02-M-9150-01, decided January 24, 2003

This issue is governed by Fed.R.Evid. 702, which states as follows:

> If scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education, may testify thereto in the form of an opinion or otherwise, if (1) the testimony is based upon sufficient facts or data, (2) the testimony is the product of reliable principles and methods, and (3) the witness has applied the principles and methods reliably to the facts of the case. [This rule was amended in 2000 in response to *Daubert* v. *Merrell Dow Pharmaceuticals, Inc.* (1993) and *Kumho Tire Co. Ltd. v. Carmichael* (1999).]

In *Daubert,* the court, focusing on the admissibility of scientific expert testimony, held that the trial judge has the task of ensuring that an expert's testimony both rests on a reliable foundation and is relevant to the task at hand. In *Kumho Tire,* the court held that a trial judge's gatekeeping obligation applies not only to testimony based on scientific knowledge, but also to testimony based on technical and other specialized knowledge.

Among the studies cited by Mr. Hammond is a study by Professor Sargur Srihari on the individuality of handwriting. Using handwriting of 1500 individuals, his conclusions were that, using computer software, they were able to establish with a 98% confidence that the writer can be identified. Taking the results over the entire population, they were able to validate handwriting individuality with a 96% confidence. By considering finer features, Professor Srihari opined that they should be able to validate handwriting individuality with a near 100% confidence. A study by Dr. Moshe Kam indicates that professional document examiners had only a 6.5% error rate compared to an error rate of 38.3% for nonprofessionals. Dr. Kam concluded by stating that professional document examiners possess writer identification skills absent in the general population. Another study by Professor Kam indicated that professionals concluded that forgeries were genuine 0.49% of the time whereas laypersons did so 6.47% of the time. Professionals mistakenly concluded that genuine signatories were forgeries 7.05% of the time; laypersons did so 26.1% of the time. Another study by Jodi Sita, Brian Found and others found that forensic document examiners made errors in 3.4% of their opinions, while 19.1% of the control group gave erroneous opinions.

The above studies provide solid evidence that handwriting individuality can be validated with a very high degree of confidence, and that professional forensic document examiners have developed an expertise and training that allow them to correctly identify a person's handwriting with a much lower error rate than laypersons. On the other hand, the affidavit, of Dr. Saks raises legitimate questions concerning the validity of these studies and the accuracy of handwriting identification in general.

However, in *Daubert,* the U.S. Supreme Court made it clear that "it would be unreasonable to conclude that the subject of scientific testimony must be known to a certainty; arguably, there are no certainties in science. . . . Science . . . represents a process for proposing and refining theoretical explanations about the world that are subject to further testing and refinement." It is sufficient if the proposed testimony can be supported by appropriate validation, i.e., good grounds, based on what is known.

PAULETTE LUCÍA RICART OBJIO
Legal Interpreter

The undersigned, PAULETTE LUCÍA RICART OBJIO, Legal Interpreter of the Dominican Republic, appointed to legally exercise my duties, CERTIFY that I have loyally translated a document written in the SPANISH language, which version in ENGLISH, according to the best of my knowledge reads as follows:

[Page 1]

[National Coat of Arms of the Dominican Republic]
Dominican Republic
MINISTRY OF FOREIGN AFFAIRS
Viceministry of Consular and Immigration Matters
Document Legalization Direction

APOSTILLE
(Convention de la Haye du 5 octobre 1961)

1. **Country:** DOMINICAN REPUBLIC

This public document

2. **Has been signed by:** MASSIEL TAVERAS HERNANDEZ
3. **Acting in the capacity of:** AUTHORIZED SIGNATURE
4. **Bears the seal/stamp of:** OFFICE OF THE ATTORNEY GENERAL

Certified

5. **At:** SANTO DOMINGO
6. **On the:** 11/20/2023
7. **By:** OPINIO ANTONIO DIAZ VARGAS - VICE-MINISTER OF CONSULAR AND IMMIGRATION MATTERS
8. **Under the No.** AP-2023-11-20-801
9. **Seal / Stamp:** [Seal]
10. **Signature:** [Illegible Signature]

Verification			
Country of Destination:	UNITED STATES OF AMERICA	**Verification Code:**	XKGHJ5U3A8YRP4
This Apostille only certifies the authenticity of the signature and the capacity of the person who has signed the public document and, where appropriate, the identity of the seal or stamp which the public document bears.		[QR Code]	

[Page 2 and 3]

NOTARIAL CERTIFICATION.-

I, LICDA. **MAGALY CALDERÓN GARCÍA, Notary Public of the Number of the National District, CERTIFY AND WITNESS that, in my protocol books, there is an act passed before me, which transcribed in its entirety reads as follows: NOTARIAL PROMISSORY NOTE. ACT NUMBER ONE HUNDRED AND FORTY EIGHT (148).-** In the City of Santo Domingo, National District, Capital of the Dominican Republic, on the eleventh (11th) day of June of the year two

Q1
11/20/2023
QDE
EXHIBIT

thousand and twenty one (2021), before me, LICDA. MAGALY CALDERÓN GARCIA, Dominican, of legal age, single, attorney at law, Notary Public of the Number of the National District, Collegiate No. thirteen eighty nine (1389), holder of the identity and electoral card No. zero zero one zero zero six zero seven zero seven nine nine seven (001-0060797-7), with professional office open at Pasteur Street No. two five six (256), Hidalgo Building one (I), apt. three zero one (301), Gazcue Sector, National District, Dominican Republic, have appeared, freely and voluntarily, as **JOINT AND SOLIDARITY DEBTORS**, Mr. **WILLIAM MATTHEW HAWK**, American citizen, of legal age, single, identified by American passport number five six seven four seven three three three eight seven (No. 567473387), residing at Rafael Hernandez Street, Torre Montecruz, Apartment three (3) A, Naco, City of Santo Domingo, National District, Capital of the Dominican Republic; JOSÉ DALBY CONTRERAS REYES, Dominican, of legal age, single, bearer of identity and electoral card number zero five two dash zero zero one zero two nine nine guide three (052-0010299-3), with domicile in Sarasota Avenue number twenty (20), Torre Empresarial AIRD Building, Apartment four (4) Northwest, La Julia, City of Santo Domingo, National District, capital of the Dominican Republic, who appear personally and, once they are before me, have declared freely and voluntarily the following: FIRST: That they **ACKNOWLEDGE AND DECLARE TO BE JOINT AND SOLIDARY DEBTORS** of the company **CATRAIN BUSINESS MANAGEMENT, S.R.L.**, constituted in accordance with the Dominican laws with RNC number one dash one three one two seven nine six zero dash two (1-3127960-2), social domicile established in Sarasota Avenue number twenty (20), Torre Empresarial AIRD Building, Apartment four dash (4-) Northwest, La Julia, of this city of Santo Domingo, National District, Capital of the Dominican Republic, duly represented by LIC. SALVADOR CATRAIN CALDERON, Dominican, of legal age, married, lawyer by profession, holder of identity and voter's card number zero zero one zero dash zero six zero six two five five five four dash zero (001-0062554-0), of this domicile and residence; for the amount of TWO HUNDRED AND NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS AND 00/100 (US$295,000. 00), for concept of personal loan acquired and received on this same date, and by means of this authentic document; SECOND: That the parties hereto **BIND AND COMMIT** themselves to pay the amounts owed in monthly payments composed of principal and eight percent (8%) fixed annual interest, in the following manner: forty-eight (48) monthly, fatal and consecutive installments of EIGHT THOUSAND ONE HUNDRED AND TWELVE DOLLARS AND 50/100 DOLLAR CENTS (US$8,112.50) beginning on the seventeenth (17th) day of July of the year two thousand twenty-one (2021), and ending on the seventeenth (17th) day of June of the year two thousand twenty-five (2025); THIRD: That in order to strengthen the guarantees of the aforementioned debt, the parties hereto **DECLARE TO COMMIT** the universality of their own assets and rights, present and future until the total and definitive payment of the amount owed; and that if the payment obligation is not complied with on each of the dates and conditions indicated, both for the payment of interest and principal, and for the simple failure to pay any of the installments, they shall lose the benefit of the established term as of right, becoming immediately due the total amount owed in interest, capital, legal expenses, and other accessory expenses, without any previous judicial or extrajudicial formality and without the need of default; FOURTH: That the parties acknowledge that the present notarial promissory note has the enforceable force of a judgment by virtue of what is established in ARTICLE 545 OF THE CODE OF CIVIL PROCEDURE. Done and passed in my office on the date indicated above and read in its entirety to the undersigned, as well as to the instrumental witnesses present, Mrs. **JENNY HORTENCIA MENA DÍAZ** and EDUARD BAUTISTA, both Dominicans, of legal age, holders of identity and voter identification card numbers four, zero, two, dash, two, zero, six, one, one, seven, three, dash, one (402-2061173-1) and zero, zero, zero, one, dash, one, seven, seven, six, zero, zero, zero, eight, dash, two (001-1776008-2) respectively, domiciled and residing in the City of Santo Domingo de Guzmán, National District, Capital of the Dominican Republic; who after hearing it in sign of approval, sign it before me and together with me, Notary Public that I certify and attest, also writing the undersigned, Mr. **WILLIAM MATTHEW HAWK** and Mr. **JOSÉ DALBY CONTRERAS REYES**, in their own handwriting the following. **"GOOD AND VALID FOR THE SUM OF TWO HUNDRED NINETY FIVE THOUSAND UNITED STATES DOLLARS AND 00/100 (US$295,000.00)"**. Space to write **"GOOD AND VALID FOR THE AMOUNT OF TWO HUNDRED NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS WITH 00/100 (US$295,000.00)"**. That I **certify and attest**.- Signed, **WILLIAM MATTHEW HAWK**, (Declarant), and **JOSÉ DALBY CONTRERAS REYES**, (Declarant), **JENNY HORTENCIA MENA DÍAZ**, (Witness), and EDUARD BAUTISTA, (Witness), **LICDA. MAGALY CALDERÓN GARCÍA**, (Notary Public). Registered in Santo Domingo, National District, capital of the Dominican Republic, on the twenty-ninth (29th) day of September of the year two thousand twenty-two (2022), Letter DG-AC, Registration No. 2022-52503, registered in the address of the Civil Registry and Conservancy of Mortgages. Issued the FIRST true and correct copy of the original, at the request of the interested party. In the city of Santo Domingo, National District, capital of the Dominican Republic, on the twenty-ninth (29th) day of September of the year two thousand and twenty-two (2022).

[Illegible Signature and Seal]
LICDA. MAGALY CALDERON GARCIA
Notary Public
Collegiate No. 1389.-

[Seal of the Office of the Attorney General]

[Page 4 and 5]

LICDA. MAGALY CALDERON GARCIA

Q1
11/20/2023
QDE
EXHIBIT

QDE Subject: Jenny Hortencia Mena

NOTARY PUBLIC [Seal]

PROMISSORY NOTE

ACT NUMBER ONE HUNDRED AND FORTY EIGHT (148).- In the City of Santo Domingo, National District, Capital of the Dominican Republic, on the eleventh (11th) day of June of the year two thousand and twenty one (2021), before me, **LICDA. MAGALY CALDERON GARCIA**, Dominican, of legal age, single, attorney at law, Notary Public of the Number of the National District, Collegiate No. thirteen eighty nine (1389), holder of the identity and electoral card No. zero zero one zero zero six zero seven zero seven nine nine seven (001-0060797-7), with professional office open at Pasteur Street No. two five six (256), Hidalgo Building one (I), apt. three zero one (301), Gazcue Sector, National District, Dominican Republic, have appeared, freely and voluntarily, as **JOINT AND SOLIDARITY DEBTORS**, Mr. **WILLIAM MATTHEW HAWK**, American citizen, of legal age, single, identified by American passport number five six seven four seven three three eight seven (No. 567473387), residing at Rafael Hernandez Street, Torre Montecruz, Apartment three (3) A. Naco, City of Santo Domingo, National District, Capital of the Dominican Republic; **JOSE DALBY CONTRERAS REYES**, Dominican, of legal age, single, bearer of identity and electoral card number zero five two dash zero zero one zero two nine nine guide three (052-0010299-3), with domicile in Sarasota Avenue number twenty (20), Torre Empresarial AIRD Building, Apartment four (4) Northwest, La Julia, City of Santo Domingo, National District, capital of the Dominican Republic, who appear personally and, once they are before me, have declared freely and voluntarily the following: **FIRST:** That they **ACKNOWLEDGE AND DECLARE TO BE JOINT AND SOLIDARY DEBTORS** of the company **CATRAIN BUSINESS MANAGEMENT, S.R.L.**, constituted in accordance with the Dominican laws with RNC number one dash one three one two seven nine six zero dash two (1-3127960-2), social domicile established in Sarasota Avenue number twenty (20), Torre Empresarial AIRD Building, Apartment four dash (4-) Northwest, La Julia, of this city of Santo Domingo, National District, Capital of the Dominican Republic, duly represented by LIC. SALVADOR CATRAIN CALDERON, Dominican, of legal age, married, lawyer by profession, holder of identity and voter's card number zero zero one zero dash zero six zero six two five five five four dash zero (001¬0062554-0), of this domicile and residence; for the amount of **TWO HUNDRED AND NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS AND 00/100 (US$295,000. 00)**, for concept of personal loan acquired and received on this same date, and by means of this authentic document; **SECOND:** That the parties hereto **BIND AND COMMIT** themselves to pay the amounts owed in monthly payments composed of principal and eight percent (8%) fixed annual interest, in the following manner: forty-eight (48) monthly, fatal and consecutive installments of **EIGHT THOUSAND ONE HUNDRED AND TWELVE DOLLARS AND 50/100 DOLLAR CENTS (US$8,112.50)** beginning on the seventeenth (17th) day of July of the year two thousand twenty-one (2021), and ending on the seventeenth (17th) day of June of the year two thousand twenty-five (2025); **THIRD:** That in order to strengthen the guarantees of the aforementioned debt, the parties hereto **DECLARE TO COMMIT** the universality of their own assets and rights, present and future until the total and definitive payment of the amount owed; and that if the payment obligation is not complied with on each of the dates and conditions indicated, both for the payment of interest and principal, and for the simple failure to pay any of the installments, they shall lose the benefit of the established term as of right, becoming immediately due the total amount owed in interest, capital, legal expenses, and other accessory expenses, without any previous judicial or extrajudicial formality and without the need of default; **FOURTH:** That the parties acknowledge that the present notarial promissory note has the enforceable force of a judgment by virtue of what is established in **ARTICLE 545 OF THE CODE OF CIVIL PROCEDURE**. Done and passed in my office on the date indicated above and read in its entirety to the undersigned, as well as to the instrumental witnesses present, Mrs. **JENNY HORTENCIA MENA DIAZ** and **EDUARD BAUTISTA**, both Dominicans, of legal age, holders of identity and voter identification card numbers four, zero, two, dash, two, zero, six, one, one, seven, three, dash, one (402-2061173-1) and zero, zero, one, dash, one, seven, seven, six, zero, zero, zero, eight, dash, two (001-1776006-2) respectively, domiciled and residing in the City of Santo Domingo de Guzmán, National District, Capital of the Dominican Republic; who after hearing it in sign of approval, sign it before me and together with me, Notary Public that I certify and attest. also writing the undersigned, Mr. **WILLIAM MATTHEW HAWK** and Mr. **JOSÉ DALBY CONTRERAS REYES**, in their own handwriting the following. **"GOOD AND VALID FOR THE SUM OF TWO HUNDRED NINETY FIVE THOUSAND UNITED STATES DOLLARS AND 00/100 (US$295,000.00)".**

Space to write "GOOD AND VALID FOR THE AMOUNT OF TWO HUNDRED NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS WITH 00/100 (US$295,000.00)".

[Handwritten]
1.- GOOD AND VALID FOR THE AMOUNT OF TWO HUNDRED NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS WITH 00/100 (US$295,000.00).

2.- GOOD AND VALID FOR THE AMOUNT OF TWO HUNDRED NINETY FIVE THOUSAND NORTH AMERICAN DOLLARS WITH 00/100 (US$295,000.00).

[Illegible Signature]
WILLIAM MATTHEW HAWK
DECLARANT DEBTOR

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EXHIBIT

QDE Subject: Jenny Hortencia Mena

[Illegible Signature]
JOSE DALBY CONTRERAS REYES
DECLARANT DEBTOR

[Illegible Signature]
JENNY HORTENCIA MENA
WITNESS.-

[Illegible Signature]
EDUARD BAUTISTA
WITNESS.-

[Illegible Signature and Seal]
LICDA. MAGALY CALDERON GARCIA
NOTARY PUBLIC

[Seal of the Mayor's Office]

IN FAITH OF WHICH, I sign and seal this translation, that is faithful according to the original document, issued by request of the interested party, in the city of Santo Domingo, National District, capital of the Dominican Republic, today, on the twenty-fourth (24th) day of the month of July of the year two thousand twenty-four (2024).

Q1
11/20/2023
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República Dominicana
MINISTERIO DE RELACIONES EXTERIORES
Viceministerio para Asuntos Consulares y Migratorios
Dirección de Legalización de Documentos

APOSTILLA

(Convention de la Haye du 5 octobre 1961)

1.País: Country / Pays	REPÚBLICA DOMINICANA

El presente documento público
This public document / Le présent acte public

2.Ha sido firmado por: Has been signed by / A été signé par	MASSIEL TAVERAS HERNANDEZ
3.Quien actúa en calidad de: Acting in the capacity of / Agissant en qualité de	FIRMA AUTORIZADA
4.Y está revestido del sello / timbre de: Bears the seal / stamp of Est revêtu du sceau / timbre de	PROCURADURIA GENERAL DE LA REPUBLICA

Certificado
Certified / Attesté

5.En: At / À	SANTO DOMINGO	6.El día: The / Le	20/11/2023
7.Por: By / Par	OPINIO ANTONIO DIAZ VARGAS - VICEMINISTRO ASUNTOS CONSULARES Y MIGRATORIOS	8.Bajo el número: N° / Sous"	AP-2023-11-20-801
9.Sello / Timbre: Seal / Stamp Sceau / Timbre		10.Firma: Signature	

Verificación
Verification / Vérification

País Destino:	ESTADOS UNIDOS DE AMÉRICA	**Código de verificación:**	XKGHJ5U3A8YR5P4

Esta Apostilla certifica únicamente la autenticidad de la firma, la calidad en que el signatario del documento haya actuado, y en su caso, la identidad del sello o timbre del que el documento público está revestido.

This Apostille only certifies the authenticity of the signature and the capacity of the person who has signed the public document, and, where appropriate, the identity of the seal or stamp which the public document bears.

Cette Apostille atteste uniquement la véracité de la signature, la qualité en laquelle le signataire de l'acte a agi et, le cas échéant, l'identité du sceau ou timbre dont cet acte public est revêtu.

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QDE Subject: Jenny Hortencia Mena

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COMPULSA NOTARIAL.-

Yo, LICDA. MAGALY CALDERÓN GARCÍA, Notario Público de los del Número del Distrito Nacional, CERTIFICO Y DOY FE que, en mis libros protocolares, existe un acto pasado por ante mí, el cual transcrito íntegramente dice lo siguiente: PAGARE NOTARIAL. ACTO NÚMERO CIENTO CUARENTA Y OCHO (148).- En la Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, a los once (11) días del mes de junio del año dos mil veintiuno (2021), por ante mí, **LICDA. MAGALY CALDERÓN GARCÍA,** dominicana, mayor de edad, soltera, abogada, Notario Público de los del Número del Distrito Nacional, Colegiatura No. trece ochenta y nueve(1389), titular de la cédula de identidad y electoral No. cero cero uno guión cero cero seis cero siete nueve siete guión siete (001-0060797-7), con estudio profesional abierto en la calle Pasteur No. dos cinco seis (256), Edificio Hidalgo uno (I), apto. tres cero uno (301), Sector Gazcue, Distrito Nacional, República Dominicana, han comparecido, libre y voluntariamente, en calidad de **DEUDORES CONJUNTOS Y SOLIDARIOS** los señores **WILLIAM MATTHEW HAWK**, ciudadano norteamericano, mayor de edad, soltero, identificado por el pasaporte norteamericano número cinco seis siete cuatro siete tres tres ocho siete (No. 567473387), con domicilio en la calle Rafael Hernandez, Torre Montecruz, Apartamento tres (3) A, Naco, Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana; **JOSÉ DALBY CONTRERAS REYES,** dominicano, mayor de edad, soltero, portador de la cédula de identidad y electoral Número cero cinco dos guión cero cero uno cero dos nueve nueve guion tres (052-0010299-3), con domicilio en la avenida Sarasota número veinte (20), Edificio Torre Empresarial AIRD, Apartamento cuatro (4) Noroeste, La Julia, Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, quienes comparecen a título personal, y una vez ante mí, me han declarado libre y voluntariamente lo siguiente: **PRIMERO:** Que **RECONOCEN Y DECLARAN SER DEUDORES CONJUNTOS Y SOLIDARIOS** de la sociedad **CATRAIN BUSINESS MANAGEMENT, SRL**, constituida de conformidad a las leyes dominicanas con RNC número uno guión tres uno dos siete nueve seis cero guión dos (1-3127960-2), con domicilio social establecido en la avenida Sarasota número veinte (20), Edificio Torre Empresarial AIRD, Apartamento cuatro guión (4-) Noroeste, La Julia, de esta ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, debidamente representada por **LIC. SALVADOR CATRAIN CALDERON**, dominicano, mayor de edad, casado, abogado de profesión, portador de la cédula de identidad y electoral número cero cero uno guión cero cero seis dos cinco cinco cuatro guión cero (001-0062554-0), de este domicilio y residencia; por la suma de **DOSCIENTOS NOVENTA Y CINCO MIL DÓLARES NORTEAMERICANOS CON 00/100 (US$295,000.00),** por concepto de préstamo personal adquirido y recibido en esta misma fecha, y por medio al presente documento auténtico; **SEGUNDO:** Que los comparecientes se **OBLIGAN Y COMPROMETEN** a pagar los valores adeudados en pagos mensuales compuestos de capital y un ocho por ciento (8%) de interés anual fijo, de la siguiente manera: cuarenta y ocho (48) cuotas mensuales, fatales y consecutivas de **OCHO MIL CIENTO DOCE DOLARES CON 50/100 CENTAVOS DE DÓLAR (US$8,112.50)** iniciando el día diecisiete (17) de julio del año dos mil veintiuno (2021), y terminando el diecisiete (17) de junio del año dos mil veinticinco (2025); **TERCERO:** Que para fortalecer las garantías de la mencionada deuda, los comparecientes **DECLARAN COMPROMETER** la universalidad de sus bienes y derechos propios, presentes y futuros hasta el pago total y definitivo de la suma adeudada; y que de no cumplirse con la obligación de pago en cada una de las fechas y condiciones indicadas, tanto para el pago de los intereses como del capital, y por el simple incumplimiento de pago en cualquiera de las cuotas, perderán de pleno derecho el beneficio del término establecido,

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haciéndose exigible inmediatamente la totalidad del monto adeudado en intereses, capital, gastos legales, y demás gastos accesorios, sin ninguna formalidad judicial o extrajudicial previa y sin necesidad de puesta en mora; **CUARTO:** Que los comparecientes reconocen que el presente pagaré notarial posee la fuerza ejecutoria de una sentencia en virtud de lo que establece el **ARTÍCULO 545 DEL CÓDIGO DE PROCEDIMIENTO CIVIL.** Hecho y pasado en mi estudio en la fecha arriba indicada y leído por entero a la compareciente, así como a los testigos instrumentales presentes, las señoras **JENNY HORTENCIA MENA DÍAZ** y **EDUARD BAUTISTA,** ambos dominicanos, mayores de edad, titulares de la cédulas de identidad y electoral números cuatro, cero, dos, guion, dos, cero, seis, uno, uno, siete, tres, guion, uno (402-2061173-1) y cero, cero, uno, guion, uno, siete, siete, seis, cero, cero, ocho, guion, dos (001-1776008-2) respectivamente, domiciliados y residentes en la Ciudad de Santo Domingo de Guzmán, Distrito Nacional, Capital de la República Dominicana; quienes después de oírlo en señal de aprobación, lo firman por ante mí y junto conmigo, Notario Público que Certifico y Doy Fe, escribiendo igualmente los comparecientes, Señores **WILLIAM MATTHEW HAWK** y **JOSÉ DALBY CONTRERAS REYES,** de su puño y letra lo siguiente. **"BUENO Y VÁLIDO POR LA SUMA DE DOSCIENTOS NOVENTA Y CINCO MIL DÓLARES NORTEAMERICANOS CON 00/100 (US$295,000.00)". Espacio para escribir "BUENO Y VÁLIDO POR LA SUMA DE DOSCIENTOS NOVENTA Y CINCO MIL DOLARES NORTEAMERICANOS CON 00/100 (US$295,000.00)." Que certifico y doy fe.-** Firmado, **WILLIAM MATTHEW HAWK,** (Declarante), y **JOSÉ DALBY CONTRERAS REYES,** (Declarante), **JENNY HORTENCIA MENA DÍAZ,** (Testigo), y **EDUARD BAUTISTA,** (Testigo), **LICDA. MAGALY CALDERÓN GARCÍA,** (Notario Público). Registrado en Santo Domingo, Distrito Nacional, capital de la República Dominicana, en fecha veintinueve (29) de septiembre del año dos mil veintidós (2022), Letra DG-AC, Registro No. 2022-52503, registrado en la dirección del Registro Civil y Conservaduría de Hipotecas. Expedida la **PRIMERA** copia fiel y conforme a su original, a solicitud de la parte interesada. En la ciudad de Santo Domingo, Distrito Nacional, capital de la República Dominicana, en fecha veintinueve (29) de septiembre del año dos mil veintidós (2022).-

LICDA. MAGALY CALDERÓN GARCÍA
Notario Público
Matrícula No. 1389.

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EXHIBIT

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LICDA. MAGALY CALDERON GARCÍA
NOTARIO PUBLICO

PAGARE NOTARIAL

ACTO NÚMERO CIENTO CUARENTA Y OCHO (148).- En la Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, a los once (11) días del mes de junio del año dos mil veintiuno (2021), por ante mí, **LICDA. MAGALY CALDERÓN GARCÍA,** dominicana, mayor de edad, soltera, abogada, Notario Público de los del Número del Distrito Nacional, Colegiatura No. 1389, titular de la cédula de identidad y electoral No. 001-0060797-7, con estudio profesional abierto en la calle Pasteur No. 256, Edificio Hidalgo I, apto. 301, Sector Gazcue, Distrito Nacional, República Dominicana, han comparecido, libre y voluntariamente, en calidad de **DEUDORES CONJUNTOS Y SOLIDARIOS** los señores **WILLIAM MATTHEW HAWK**, ciudadano norteamericano, mayor de edad, soltero, identificado por el pasaporte norteamericano número cinco seis siete cuatro siete tres tres ocho siete (No. 567473387), con domicilio en la calle Rafael Hernandez, Torre Montecruz, Apartamento 3 A, Naco, Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana; **JOSÉ DALBY CONTRERAS REYES,** dominicano, mayor de edad, soltero, portador de la cédula de identidad y electoral Número cero cinco dos guión cero cero uno cero dos nueve nueve guion tres (052-0010299-3), con domicilio en la avenida Sarasota número veinte (20), Edificio Torre Empresarial AIRD, Apartamento cuatro (4) Noroeste, La Julia, Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana quienes comparecen a título personal, y una vez ante mí, me han declarado libre y voluntariamente lo siguiente: **PRIMERO:** Que **RECONOCEN Y DECLARAN SER DEUDORES CONJUNTOS Y SOLIDARIOS** de la sociedad **CATRAIN BUSINESS MANAGEMENT, SRL,** constituida de conformidad a las leyes dominicanas con RNC número uno guión tres uno dos siete nueve seis cero guión dos (1-3127960-2), con domicilio social establecido en la avenida Sarasota número veinte (20), Edificio Torre Empresarial AIRD, Apartamento 4-Noroeste, La Julia, de esta ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, debidamente representada por **LIC. SALVADOR CATRAIN CALDERON**, dominicano, mayor de edad, casado, abogado de profesión, portador de la cédula de identidad y electoral número cero cero uno guión cero cero seis dos cinco cinco cuatro guión cero (001-0062554-0), de este domicilio y residencia; por la suma de **DOSCIENTOS NOVENTA Y CINCO MIL DÓLARES NORTEAMERICANOS CON 00/100 (US$295,000.00),** por concepto de préstamo personal adquirido y recibido en esta misma fecha, y por medio al presente documento auténtico; **SEGUNDO:** Que los comparecientes se **OBLIGAN Y COMPROMETEN** a pagar los valores adeudados en pagos mensuales compuestos de capital y un ocho por ciento (8%) de interés anual fijo, de la siguiente manera: cuarenta y ocho (48) cuotas mensuales, fatales y consecutivas de **OCHO MIL CIENTO DOCE DOLARES CON 50/100 CENTAVOS DE DÓLAR (US$8,112.50)** iniciando el día diecisiete (17) de julio del año dos mil veintiuno (2021), y terminando el diecisiete (17) de junio del año dos mil veinticinco (2025); **TERCERO:** Que para fortalecer las garantías de la mencionada deuda, los comparecientes **DECLARAN COMPROMETER** la universalidad de sus bienes y derechos propios, presentes y futuros hasta el pago total y definitivo de la suma adeudada; y que de no cumplirse con la obligación de pago en cada una de las fechas y condiciones indicadas, tanto para el pago de los intereses como del capital, y por el simple incumplimiento de pago en cualquiera de las cuotas, perderán de pleno derecho el beneficio del término establecido, haciéndose exigible inmediatamente la totalidad del monto adeudado en intereses, capital, gastos legales, y demás gastos accesorios, sin ninguna formalidad judicial o extrajudicial previa y sin necesidad de puesta en mora; **CUARTO:** Que los comparecientes reconocen que el presente pagaré notarial

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posee la fuerza ejecutoria de una sentencia en virtud de lo que establece el **ARTÍCULO 545 DEL CÓDIGO DE PROCEDIMIENTO CIVIL.** Hecho y pasado en mi estudio en la fecha arriba indicada y leído por entero a la compareciente, así como a los testigos instrumentales presentes, las señoras **JENNY HORTENCIA MENA DÍAZ** y **EDUARD BAUTISTA,** ambos dominicanos, mayores de edad, titulares de la cédulas de identidad y electoral números cuatro, cero, dos, guion, dos, cero, seis, uno, uno, siete, tres, guion, uno (402-2061173-1) y cero, cero, uno, guion, uno, siete, siete, seis, cero, cero, ocho, guion, dos (001-1776008-2) respectivamente, domiciliados y residentes en la Ciudad de Santo Domingo de Guzmán, Distrito Nacional, Capital de la República Dominicana; quienes después de oírlo en señal de aprobación, lo firman por ante mí y junto conmigo, Notario Público que Certifico y Doy Fe, escribiendo igualmente los comparecientes, Señores **WILLIAM MATTHEW HAWK** y **JOSÉ DALBY CONTRERAS REYES,** de su puño y letra lo siguiente. **"BUENO Y VÁLIDO POR LA SUMA DE DOSCIENTOS NOVENTA Y CINCO MIL DÓLARES NORTEAMERICANOS CON 00/100 (US$295,000.00)".**

Espacio para escribir "BUENO Y VÁLIDO POR LA SUMA DE DOSCIENTOS NOVENTA Y CINCO MIL DOLARES NORTEAMERICANOS CON 00/100 (US$295,000.00)."

1.- Bueno y valido por la suma de doscientos noventa y cinco mil dolares norteamericanos con 00/100 (US$295,000.00)

2.- Bueno y valido por la suma de Doscientos noventa y Cinco mil Dolares norteamericanos con 00/100 (US$295,000.00)

WILLIAM MATTHEW HAWK,
DEUDOR DECLARANTE-COMPARECIENTE.-

Q1 11/20/2023

JOSÉ DALBY CONTRERAS REYES,
DEUDOR DECLARANTE-COMPARECIENTE.-

Jenny Mena

SRA. JENNY HORTENCIA MENA,
TESTIGO.-

Eduard B

SR. EDUARD BAUTISTA,
TESTIGO.-

LICDA. MAGALY CALDERÓN GARCÍA
NOTARIO PÚBLICO.-

ADN
Ayuntamiento Distrito Nacional
Registrado en Santo Domingo, D.N.
Q1
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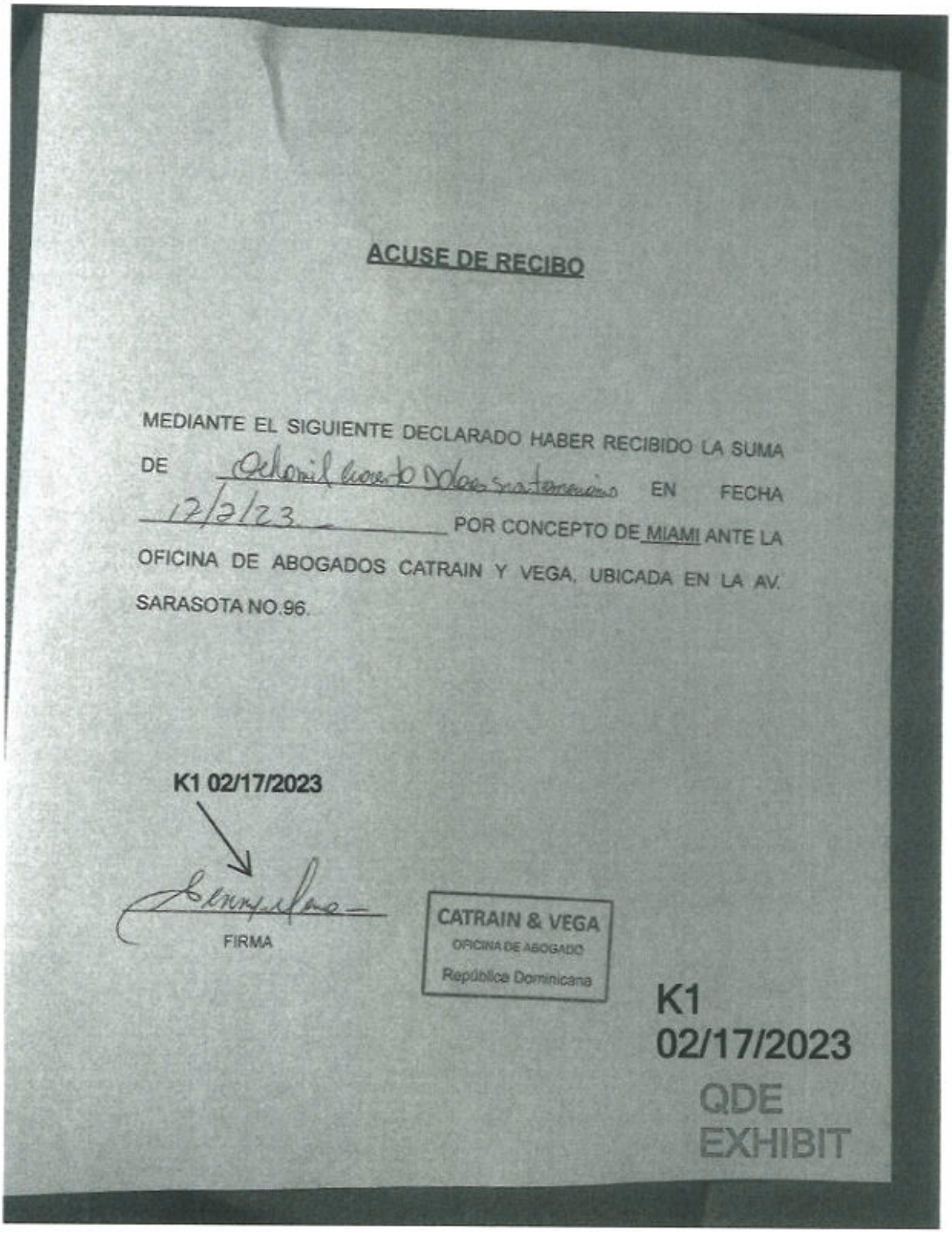
QDE Subject: Jenny Hortencia Mena



ACUSE DE RECIBO

MEDIANTE EL SIGUIENTE DECLARADO HABER RECIBIDO LA SUMA DE Ochenta cuarenta dólares sostenidos EN FECHA 12/2/23 POR CONCEPTO DE MIAMI ANTE LA OFICINA DE ABOGADOS CATRAIN Y VEGA, UBICADA EN LA AV. SARASOTA NO.96.

K1 02/17/2023

FIRMA

CATRAIN & VEGA
OFICINA DE ABOGADO
República Dominicana

K1
02/17/2023
QDE
EXHIBIT

ACUSE DE RECIBO

MEDIANTE EL SIGUIENTE DECLARADO HABER RECIBIDO LA SUMA DE Ocho mil (8,000) US dolares. EN FECHA 20/1/2023 POR CONCEPTO DE MIAMI ANTE LA OFICINA DE ABOGADOS CATRAIN Y VEGA, UBICADA EN LA AV. SARASOTA NO.96.

K2 01/20/2023

Jenny Mena
FIRMA

CATRAIN & VEGA
OFICINA DE ABOGADO
República Dominicana

K2
01/20/2023
QDE
EXHIBIT

CATRAIN & VEGA
ABOGADOS

PRESUPUESTO - ORDEN DE SERVICIO

Fecha: 12-10-2022 | No.:140-22

Ave. Sarasota No. 20, Torre Empresarial Aird, 4to.Piso, Apto. 4-Noroeste, Santo Domingo, D. N., Rep. Dom.
Teléfonos: (809) 472.2072 - Fax (809) 472.2208 - www.catrainyvega.com.do

SEÑORES:
ODES CONSULTORIA, SRL.

REFERENCIA:

ASUNTO:

DESCRIPCIÓN DE LOS SERVICIOS

PRESUPUESTO

Fase	Concepto	Importes
1	Gastos y honorarios para llevar a cabo la renovación del Registro Mercantil, por ante la Cámara de Comercio.	
	SUB-TOTAL	RD$11,750.00
	ITBIS (18%) (Opcional, solo si solicita NCF)	
	TOTAL PRESUPUESTO	

El costo total de los trabajos asciende a la suma de **ONCE MIL SETENCIENTOS PESOS DOMINICANO CON 00/100.**

FORMA DE PAGO

K3 10/12/2022

1- Cien por ciento (100%) con la aprobación de la presente orden de servicio.

Firma:

Responsable por Catrain & Vega

Sello: CATRAIN & VEGA OFICINA DE ABOGADO República Dominicana

RESPUESTA DEL CLIENTE

APROBACION DEL PRESUPUESTO - AUTORIZACION DE LA ORDEN DE SERVICIO

K3
10/12/2022
QDE
EXHIBIT

QDE Subject: Jenny Hortencia Mena

PAULETTE LUCÍA RICART OBJÍO
Legal Interpreter

The undersigned, PAULETTE LUCÍA RICART OBJÍO, Legal Interpreter of the Dominican Republic, appointed to legally exercise my duties, CERTIFY that I have loyally translated a document written in the SP[illegible] language, which version in ENGLISH, according to the best of my knowledge reads as follows: AP-2025-1-24-884

AFFIDAVIT

The undersigned, Mrs. **Jenny Hortencia Mena Díaz**, Dominican, of legal age, holder of personal identity card number four zero two dash two zero six one one seven three dash one (402-2061173-1), domiciled and resident in the city of Santo Domingo, National District, Capital of the Dominican Republic; who declares under oath freely and voluntarily: **FIRST:** That on the twenty-second (22) day of the month of June of the year two thousand twenty-one (2021), I signed the document marked with the number a hundred and forty-eight (148), dated eleventh (11) of the month of June of the year two thousand twenty-one (2021), containing the promissory note signed by Mr. **William Matthew Hawk** and Mr. **José Dalby Contreras Reyes**, the first American and the second Dominican, of legal age, the first holder of the American passport number five six seven four seven three three eight seven (567473387) and the second of the identity and electoral card number zero five two dash zero zero one zero two nine nine dash three (052-0010299-3), in favor of the company **Catrain Business Manegement, S.R.L., RNC** [Taxpayer Registry] 1-3127960-2, duly legalized by Magaly Calderón García, notary public of the number of the National District; **SECOND:** That in such sense, I proceeded to sign the notarial promissory note described above, as a witness. **DONE AND SIGNED** in good faith, in the City of Santo Domingo de Guzmán, National District, Capital of the Dominican Republic, on the nineteenth (19) day of October of the year two thousand twenty-four (2024).

[Illegible Signature]
Jenny Hortencia Mena Díaz
Declarant.

I, **Mr. Gustavo E. Vega Vega**, Notary Public of the National District, **CERTIFY AND WITNESS** that the above signature on this document was placed in my presence freely and voluntarily by Mrs. **Yenny Hortencia Mena Díaz**, whose general information appears in the body of this document and who has declared that this is the signature she is accustomed to use in all acts of her life, public and private. In the City of Santo Domingo, National District, Capital of the Dominican Republic, on the nineteenth (19) day of October of the year two thousand twenty-four (2024).

[Illegible Signature and Seal]
GUSTAVO E. VEGA VEGA
Notary Public
Enrollment No. 5531.

IN FAITH OF WHICH, I sign and seal this translation that is faithful and according to the original document, issued at the request of the interested party, in the city of Santo Domingo, National District, capital of the Dominican Republic, today, on the sixth (6th) day of the month of November of the year two thousand twenty-four (2024).

INTERPRETE JUDICIAL

K4
10/19/2024
QDE
EXHIBIT

QDE Subject: Jenny Hortencia Mena

DECLARACIÓN JURADA

Quien suscribe, la señora **Jenny Hortencia Mena Díaz**, dominicana, mayor de edad, portadora de la cédula de identidad personal número cuatro cero dos guion dos cero seis uno uno siete tres guion uno (402-2061173-1), domiciliada y residente en la ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana; quien declara bajo la fe del juramento libre y voluntariamente: **PRIMERO:** Que en fecha veintidós (22) días del mes de junio del año dos mil veinte y uno (2021), firmé el acto marcado con el número ciento cuarenta y ocho (148) de fecha once (11) del mes de junio del año dos mil veinte y uno (2021), contentivo de pagaré notarial suscrito por los señores **William Matthew Hawk** y **José Dalby Contreras Reyes**, el primero norteamericano y el segundo dominicano, mayores de edad, el primero portador del pasaporte norteamericano número cinco seis siete cuatro siete tres tres ocho siete (567473387) y el segundo de la cédula de identidad y electoral número cero cinco dos guion cero cero uno cero dos nueve nueve guion tres (052-0010299-3), a favor de la sociedad **Catrain Business Manegement, S. R. L.,** R.N.C. 1-3127960-2, debidamente legalizado por la licenciada Magaly Calderón García, notario publico de los del número del Distrito Nacional; **SEGUNDO:** Que la firma en el pagaré notarial precedentemente descrito, fue realizada en calidad de testigo. **HECHO Y FIRMADO** de buena fe, en la Ciudad de Santo Domingo de Guzmán, Distrito Nacional, Capital de la República Dominicana, a los diecinueve (19) del mes de octubre del año dos mil veinticuatro (2024).

K4 10/19/2024

Jenny Hortencia Mena Díaz
Declarante.

Yo, **Licenciado Gustavo E. Vega Vega**, Notario Público de los del Número del Distrito Nacional, **CERTIFICO Y DOY FE**, de que la firma que antecede en el presente documento fue puesta en mi presencia libre y voluntariamente por la señora **Yenny Hortencia Mena Díaz**, de generales que constan en el cuerpo del presente documento y quien me ha declarado que esa es la firma que acostumbra a utilizar en todos los actos de su vida, pública y privada. En la Ciudad de Santo Domingo, Distrito Nacional, Capital de la República Dominicana, a los diecinueve (19) del mes de octubre del año dos mil veinticuatro (2024).

Lic. GUSTAVO E. VEGA VEGA
Notario Público
Colegiatura No. 5931

GUSTAVO E. VEGA V. NOTARIO PUBLICO Colegiatura No. 5931 Santo Domingo, D.N.

K4
10/19/2024
QDE
EXHIBIT

QDE Subject: Jenny Hortencia Mena

CATRAIN & VEGA
ABOGADOS

PRESUPUESTO - ORDEN DE SERVICIO

Fecha: 07-08-2020 | No.: 91-20

Ave. Sarasota No. 20, Torre Empresarial Aird, 4to.Piso, Apto. 4-Noroeste, Santo Domingo, D. N., Rep. Dom.
Teléfonos: (809) 472.2072 - Fax (809) 472.2208 - www.catrainyvega.com.do

SEÑORES:
CESA, SRL.

REFERENCIA:

ASUNTO:

DESCRIPCIÓN DE LOS SERVICIOS

PRESUPUESTO

Fase	Concepto	Importes
	1- Venta de la compañía CESA, SRL., ya constituida para ganar tiempo, debidamente actualizada con los nuevos socios, designación gerentes y modificación objeto de dicha sociedad.	US$612.00
	2- Instrumentación y legalización Contrato de Cesión de Crédito, intervenido entre Centro Gastrodiagnostico y la sociedad CESA, SRL.	750.00
	3- Instrumentación y legalización Pacto de Accionistas de CESA, SRL.	1,000.00
1	**SUB-TOTAL**	2,362.00
	ITBIS (18%) (Opcional, solo si solicita NCF)	
	TOTAL PRESUPUESTO	

El costo total de los trabajos asciende a la suma de **DOS MIL TRESCIENTOS SESENTA Y DOS DOLARES NORTEAMERICANOS CON 00/100.**

FORMA DE PAGO

1- Cien por ciento (100%) con la aprobación de la presente orden de servicio.

K5
08/07/2020
QDE
EXHIBIT

QDE Subject: Jenny Hortencia Mena

K5 08/07/2020

Firma: Responsable por Catrain & Vega	Sello: CATRAIN & VEGA OFICINA DE ABOGADO República Dominicana

RESPUESTA DEL CLIENTE	
APROBACION DEL PRESUPUESTO - AUTORIZACION DE LA ORDEN DE SERVICIO	
Persona responsable de la aprobación y autorización:	
Firma: Responsable Aprobación-Autorización	Sello: Si aplica.

FACTURACIÓN		
Factura a nombre de:		RNC:
Domicilio:		
Persona de contacto:	Teléfono:	E-mail:

K5
08/07/2020
QDE
EXHIBIT

QDE Subject: Jenny Hortencia Mena

CATRAIN & VEGA
ABOGADOS

PRESUPUESTO - ORDEN DE SERVICIO

Fecha: 07-09-2020 | No.: 107-20

Ave. Sarasota No. 20, Torre Empresarial Aird, 4to.Piso, Apto. 4- Noroeste, Santo Domingo, D. N., Rep. Dom.
Teléfonos: (809) 472.2072 - Fax (809) 472.2208 - www.catrainvega.com.do

SEÑOR: William Matthew Hawk

REFERENCIA:

ASUNTO:

DESCRIPCIÓN DE LOS SERVICIOS

PRESUPUESTO

Fase	Concepto	Importes
1	Gastos y honorarios por la constitución sociedad tipo SRL. con un capital de RD$100,000.00 **SUB-TOTAL** **ITBIS (18%) (Opcional, solo si solicita NCF)** **TOTAL PRESUPUESTO**	RD$30,000.00

El costo total de los trabajos asciende a la suma de **TREINTA MIL PESOS DOMINICANOS CON 00/100**

FORMA DE PAGO

1- Cien por ciento (100%) con la aprobación de la presente orden de servicio.

K6 09/07/2020

Firma: Jenny Lora
Responsable por Catrain & Vega

Sello: CATRAIN & VEGA OFICINA DE ABOGADO República Dominicana

RESPUESTA DEL CLIENTE

APROBACION DEL PRESUPUESTO - AUTORIZACION DE LA ORDEN DE SERVICIO

Persona responsable de la aprobación y autorización:

K6
09/07/2020
QDE
EXHIBIT

QDE Subject: Jenny Hortencia Mena

CATRAIN & VEGA

PRESUPUESTO - ORDEN DE SERVICIO

Fecha: 01-12-2020 | No.: 141-20

Ave. Sarasota No. 20, Torre Empresarial Aird, 4to. Piso, Apto. 4-Noroeste, Santo Domingo, D. N., Rep. Dom.
Teléfonos: (809) 472.2072 · Fax (809) 472.2208 · www.catrainyvega.com.do

SEÑORES:
William Matthew Hawk, Pedro Pablo Vega López.

REFERENCIA:

ASUNTO:

DESCRIPCIÓN DE LOS SERVICIOS

PRESUPUESTO

Fase	Concepto	Importes
1	Instrumentación de acuerdo de colaboración y participación suscrito entre los señores **William Matthew Hawk, Pedro Pablo Vega López,** [redacted]	
	SUB-TOTAL	US$750.00
	ITBIS (18%) (Opcional, solo si solicita NCF)	
	TOTAL PRESUPUESTO	

El costo total de los trabajos asciende a la suma de **SETECIENTOS CINCUENTA DOLARES NORTEAMERICANOS CON 00/100.**

K7 12/01/2020

FORMA DE PAGO

1- Cien por ciento (100%) con la aprobación de la presente orden de servicio.

Firma: Jenny Hortencia Mena
Responsable por Catrain & Vega

Sello: CATRAIN & VEGA OFICINA DE ABOGADO República Dominicana

RESPUESTA DEL CLIENTE

K7
12/01/2020
QDE
EXHIBIT

QDE Subject: Jenny Hortencia Mena

de la cédulas de identidad y electoral números cuatro, cero, dos, guion, dos, cero, seis, uno, uno, siete, tres, guion, uno (402-2061173-1) y cero, cero, uno, guion, uno, ocho, uno, seis, nueve, siete, uno, guion, tres (001-1816971-3), respectivamente, domiciliadas y residentes en la Ciudad de Santo Domingo de Guzmán, Distrito Nacional, Capital de la República Dominicana; quienes después de oírlo en señal de aprobación, lo firman por ante mí y junto conmigo, Notario Público que Certifico y Doy Fe, escribiendo igualmente el compareciente, Señor **WILLIAM MATTHEW HAWK,** de su puño y letra lo siguiente. **"BUENO Y VÁLIDO POR LA SUMA DE NOVENTA Y CINCO MIL QUINIENTOS DÓLARES NORTEAMERICANOS CON 00/100 (US$95,500.00)".**

Espacio para escribir "BUENO Y VÁLIDO POR LA SUMA DE NOVENTA Y CINCO MIL QUINIENTOS DOLARES NORTEAMERICANOS CON 00/100 (US$95,500.00)." BUENO Y VALIDO POR LA SUMA DE NOVENTA Y CINCO MIL QUINIENTOS DOLARES NORTEAMERICANOS CON 00/100 (US$95,500.00)

WILLIAM MATTHEW HAWK.
DEUDOR DECLARANTE-COMPARECIENTE.-

K8

SRA. JENNY HORTENCIA MENA.
TESTIGO.-

SRA. STEFANI JOIVE FÉLIX PÉREZ.
TESTIGO.-

LIC. LICENCIADO GUSTAVO E. VEGA V.
NOTARIO PÚBLICO.-

LIC. GUSTAVO E. VEGA V. NOTARIO PUBLICO Colegiatura No. 5021 Santo Domingo, D.N.

ADN
Ayuntamiento Distrito Nacional
Dirección de Registro Civil y Conservaduría de Hipotecas
Registrado en Santo Domingo, D.N.
En Fecha 23/03/2021
Libro: 0042
Registro: 2021-12574
Documento: escritura privada
Percibiendo por derecho y honorario
RD$ 1,500.00
164

AYUNTAMIENTO DEL DISTRITO NACIONAL Dirección de Registro Civil Conservaduría de Hipotecas Santo Domingo, D.N.

K8

QDE
EXHIBIT

QDE Subject: Jenny Hortencia Mena

EXHIBIT E

United States District Court
for the
Southern District of Florida

Catrain Business Management, S.L.R., Plaintiff,	)	
v.	)	Civil Action No. 24-23918-Civ-Scola
William Matthew Hawk and Jose Dalby Contreras Reyes, Defendants.	)	

Order on Plaintiff's Motion to Dismiss

The Plaintiff seeks to dismiss its complaint with prejudice pursuant to Fed. R. Civ. P. 41(a)(2), because the Defendants do not consent to the dismissal. (Pl.'s Mot., ECF No. 14.) While the Defendants do not object to dismissal of the Plaintiff's claim with prejudice, they believe their counterclaim for declaratory relief is still justiciable because "Defendants face ongoing legal uncertainty as to whether the Note is invalid, whether Defendants are indebted to Plaintiff, and whether Defendants are obligated to make any additional payments on the Note." (Defs.' Resp., ECF No. 16 at 3.)

However, in its reply, the Plaintiff represents that "it will not bring any future actions against Defendants as to the subject Promissory Note (and this agreement includes any past or future alleged defaults under the Promissory Note)." (Pl.'s Reply, ECF No. 17 at 1.) Given this representation, the Court finds that the issues in this case are "no longer live" and "the parties lack a legally cognizable interest in the outcome." *Already, LLC v. Nike, Inc.*, 568 U.S. 85, 91 (2013) (citations omitted).

Moreover, the Court will not keep this case open because the Defendants *may* amend their counterclaim to add fraud allegations. As the Plaintiff points out, the time to amend counterclaims has passed and the Defendants did not mention this possibility in the joint status report the parties filed last month. (Joint Status Report, ECF No. 13.) That is not to say that the Defendants may not bring such claims in the future; it is only to say that the Defendants cannot keep this case open because of its contention, first raised in its response to the Plaintiff's motion, that it may amend its counterclaim.

Therefore, the Court **grants** the Plaintiff's motion (**ECF No. 14**.) The Plaintiff's complaint is **dismissed with prejudice**. Given its representation to the Court, this dismissal with prejudice means that the Plaintiff may not bring any future actions against Defendants as to the subject Promissory Note, which

includes any past or future alleged defaults under the Promissory Note. However, given that the Defendants may seek to bring fraud claims against the Plaintiff, the Court dismisses the Defendants' counterclaim **without prejudice**.

The clerk is directed to **close** this case.

Done and ordered in Miami, Florida, on March 27, 2025.

Robert N. Scola, Jr.
United States District Judge